



April 29, 2024

DEEP Stormwater Staff
Connecticut Department of Energy & Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

RE: Addendum to City of Hartford 2023 Annual Report for the Discharge of Stormwater from Small Municipal Separate Storm Sewer Systems (MS4 General Permit)

DEEP Stormwater Staff:

The City of Hartford (COH) is submitting the attached 2023 MS4 Annual Report from The Metropolitan District (MDC) dated April 25, 2024, as an Addendum to the COH 2023 MS4 Annual Report. The MDC reporting is being included as an addendum since the information was received after the COH Annual Report had been submitted. The MDC had previously been submitting its MS4 annual report information directly to DEEP (Report Years 2021 and 2022).

The COH has the following observations regarding the 2023 MDC MS4 Annual Report:

- Catch Basin Cleaning Reporting Metrics on Page 2: MDC identifies 1,030 catch basins in the Priority Areas and 6,600 total catch basins in the MS4 for 2023. The MS4 General Permit identifies Priority Areas as those within the urbanized area, and those catchment areas of the MS4 with either DCIA of greater than 11% or that discharge directly to impaired waters. According to the 2010 Census data, the entire City of Hartford is within the urbanized area and considered to be a Priority Area.
- Impaired Waters Outfall Investigation and Monitoring Program on Page 4: MDC is stating that the COH is solely responsible for follow-up investigations of drainage areas identified as potentially contributing to an impairment as a result of previous MDC analyses. Follow-up investigations should also include below the grate investigations of the MDC system by the MDC. In addition, MDC says there are 27 outfalls shown in Section 2.1 but there are 41 (28 of which require follow-up investigation).
- Screening Data for Outfalls to Impaired Waterbodies on Page 5: MDC states that screening data information was previously provided by MDC for the 2022 Annual Report. The MDC did not provide any reporting data to the COH for Reporting Years 2021 or 2022 and instead reported directly to DEEP. The MDC provided their screening data information from the 41 outfalls discharging to impaired waters to the COH for Reporting Year 2020.

The COH is continuing to work with the MDC to establish a Memorandum of Understanding (MOU) to coordinate efforts to comply with the MS4 General Permit.

Sincerely,



Kristin Doundoulakis, President
Atlas Environmental Company

Cc: Christopher Hayes, COH
Frank Dellaripa, COH
Nick Casparino, COH
Jonathan E. Harding, COH
Douglas A. Cohen, Brown Rudnick LLP
Zachary Bestor, Brown Rudnick LLP



The Metropolitan District
water supply · environmental services · geographic information

April 25, 2024

City of Hartford – Department of Public Works
Attn: Frank Dellaripa, P.E.
50 Jennings Road, 2nd floor
Hartford, CT 06120

RE: 2023 Annual Report for the General Permit for the Discharge of Stormwater from Small Municipal Separate Stormwater Sewer Systems (MS4 General Permit)

Dear Mr. Dellaripa:

MDC has prepared the attached information for the MS4 General Permit issued to the City of Hartford (COH) by the DEEP. MDC would like to continue to work to establish a coordinated effort with the COH for the MS4 General Permit. Therefore, this information is provided to the COH for inclusion in the Annual Report for submittal to the DEEP. Attached is the MDC information for the Best Management Practices (BMPs) which have been addressed in 2023.

If you have any questions please call me at (860) 278-7850 ext. 3451.

Regards,

Craig Scott

Craig Scott, P.E.
Manager of EH&S

Cc: Chris Levesque, MDC
Jason Waterbury, MDC
Audra Dickson, DEEP
Christopher Stone, DEEP

2023 MS4 Stormwater Annual Report

Section 6(a)(3)(A)(iii) List of citizen reports of suspected illicit discharges received during this reporting period.

Date of Report	Location / suspected source	Response taken
None		

Section 6(a)(3)(A)(v) Provide a record of illicit discharges abatement activities occurring during the 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)
Enfield Street, G-12 CSO Regulator	06/27/2023 0.8 hours	South Branch Park River Conduit	5,000 gallons	Debris	Main sewer flushed by jet truck and overflow relieved	None
Airport Road	07/21/2023 1.5 hours	Paved area to Folly Brook	> 1,000 gallons	Capacity Limitations due to 2.60" rain event	Surcharge flows must recede back to normal operating level	None
Kane Street	07/29/2023 5 minutes	South Branch Park River Conduit	< 100 gallons	Capacity Limitations due to 1.18" rain event	Surcharge flows must recede back to normal operating level	None
Manhole in ROW @ Flood Control Dike GIS2001867	09/25/2023 Unknown time	Control Dike swale to CT River	Estimated <50,000 gallons	Capacity Limitations due to 4.41" rain event	Surcharge flows must recede back to normal operating level	None
Manhole in ROW @ Flood Control Dike GIS2001867	12/18/2023 Unknown time	Control Dike swale to CT River	Estimated <50,000 gallons	Capacity Limitations due to 3.95" rain event	Surcharge flows must recede back to normal operating level	None

Section 6(a)(6)(D)(ii) Pollution Prevention/ Good Housekeeping – Catch Basin Cleaning reporting metrics.

Metrics		
Catch basin cleaning	2023	2022
Total catch basins in priority areas	1,030	1,030
Total catch basins in MS4	6,600	6,600
Catch basins inspected	1,786	1,545
Catch basins cleaned	1,786	1,545
Volume (or mass) of material removed from all catch basins	799.9 tons	840 tons
Volume removed from catch basins to impaired waters (if known)	799.9 tons	840 tons

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Catch basin cleaning program

The following information is provided for the MDC catch basin cleaning program

MDC manages all catch basins within the City.

- In 2023, there were **1,786** catch basins with either (or both) a cleaning or inspection in 2023, with a 2022 cleaning as well.
- There were **702** inspections/cleanings where data was inadequate due to either bad data or the catch basin is small or no sump.
 - 750 CBs with either (or both) a cleaning or inspection in 2023, with a 2022 cleaning
 - 289 had 50% or more sump filled when they were inspected or cleaned in 2023, after being cleaned in 2022
 - 236 had 25 to 50% sump filled when they were inspected or cleaned in 2023, after being cleaned in 2022
 - 225 had <25% sump filled when they were inspected or cleaned in 2023, after being cleaned in 2022

 - 1036 CBs with either (or both) a cleaning or inspection in 2023, with just a 2022 inspection
 - 217 had 50% or more sump filled when they were inspected or cleaned in 2023, after being inspected in 2022
 - 275 had 25 to 50% sump filled when they were inspected or cleaned in 2022, after being inspected in 2022
 - 544 had <25% sump filled when they were inspected or cleaned in 2023, after being inspected in 2022
- The above data does not include catch basins that have little or no sumps. These catch basins are inspected and tracked for condition of outlet pipes (broken/clogged), and the amount of sediment is not significant. There is usually only an inch or two of sitting sediment in these catch basins, around the invert of the outlet pipe.
- A summary of the 2022 versus 2023 Catch Basin Cleaning Analysis is provided in Attachment A.

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Section 6(i)(1)(B) Impaired Waters Outfall Investigation and Monitoring program

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.

MDC listed and mapped the MDC outfalls that discharge to impaired waters. MDC conducted screening of the 27 outfalls shown in section 2.1 below for the pollutant identified as the pollutant of concern for the impairment.

In 2018, MDC performed screening at 13 stormwater outfalls.

In 2019, MDC performed screening at 14 stormwater outfalls. Of the 27 outfalls, 18 outfalls measured E-Coli above the limit identified in Section 6(i)(1)(B) of the General Permit.

In 2020, MDC performed screening at 14 stormwater outfalls. Of the 14 outfalls, 10 outfalls measured E-Coli above the limit identified in Section 6(i)(1)(B) of the General Permit. This completes the screening for the MDC outfalls.

In 2021, COH has failed to identify and sample outfalls owned by the COH and has not provided information to MDC on follow-up investigations for the drainage areas identified as potentially contributing to an impairment as a result of the analyses. Therefore, the COH has not utilized the MDC screening results to prioritize for annual outfall sampling.

In 2022, COH has failed to identify and sample outfalls owned by the COH and has not provided information to MDC on follow-up investigations for the drainage areas identified as potentially contributing to an impairment as a result of the analyses. Therefore, the COH has not utilized the MDC screening results to prioritize for annual outfall sampling.

In 2023, COH has failed to identify and sample outfalls owned by the COH and has not provided information to MDC on follow-up investigations for the drainage areas identified as potentially contributing to an impairment as a result of the analyses. Therefore, the COH has not utilized the MDC screening results to prioritize for annual outfall sampling.

On June 20, 2023 MDC did provide assistance to EPA representatives for dry weather stormwater sampling of several stormwater outfall areas in Hartford.

2023 MS4 Stormwater Annual Report

Screening data for outfalls to impaired waterbodies

The following information was previously provided by MDC for the 2022 Annual Report

Outfall ID	Latitude / Longitude	Location	Sample date	Parameter (Nitrogen, Phosphorus, Bacteria, or Other pollutant of concern)	E-Coli Results col/100 ml	Follow-up required? *
2	41.805096, -72.706549	Just north of Burnham Street	09/10/18	Bacteria	1,600	Yes
3	41.805616, -72.706614	By Burnham & North Canaan	09/10/18	Bacteria	3,100	Yes
4	41.799490, -72.690070	Woodstock & Coventry	09/10/18	Bacteria	1,500	Yes
5	41.800746, -72.689673	Gully Brook & Tower Ave.	09/10/18	Bacteria	5,400	Yes
6	41.794592, -72.682660	Slightly NE of Vine & Love Lane	09/10/18	Bacteria	160	No
7	41.789416, -72.709175	Ogilby & Mark Twain Drive	09/10/18	Bacteria	>120,950	Yes
8	41.785032, -72.707126	Dillon & Albany	09/10/18	Bacteria	4,100	Yes
9	41.784998, -72.708466	Scarborough & Albany	09/10/18	Bacteria	<50	No
10	41.780282, -72.700663	On North branch of Park River @ Homestead Ave.	09/10/18	Bacteria	>120,950	Yes
11	41.779034, -72.701500	Woodland Drive	09/10/18	Bacteria	99,000	Yes
12	41.776282, -72.703195	Woodside Circle/St. Francis	09/10/18	Bacteria	4,300	Yes
13	41.774499, -72.701591	Woodland St. @St. Francis	09/10/18	Bacteria	2,800	Yes
14	41.774355, -72.704059	Asylum/ Woodland Circle	09/10/18	Bacteria	100	No
15	41.773310, -72.703050	Park River/ Asylum Ave.	11/12/19	Bacteria	7,800	Yes
16	41.773310, -72.703994	Asylum Avenue	11/12/19	Bacteria	920	Yes
17**	41.766496, -72.703086	Park River Conduit @ Hartford Public High School	11/12/19	Bacteria	50	No
18**	41.761521, -72.700994	Park River Conduit @ railroad tracks by Capitol Ave.	11/12/19	Bacteria	50	No
19**	41.762313, -72.693429	Park River Conduit @ Park Territory & Russ St.	11/12/19	Bacteria	1,900	Yes
20**	41.763066, -72.693440	Park River Conduit @ Park Territory btw Russ St. & Capital Avenue	11/12/19	Bacteria	1,500	Yes
21**	41.763245, -72.694282	Park River Conduit @ Park Territory & Capital Avenue	11/12/19	Bacteria	100	No
22**	41.763434, -72.692935	Park River Conduit under I-84 E. Overpass (Exit 47)	11/12/19	Bacteria	2,200	Yes
23**	41.764774, 72.687920	Park River Conduit @ Flower Street	11/12/19	Bacteria	100	No
24	41.754430, -72.701515	Pope Park Highway No. 4	11/12/19	Bacteria	600	Yes
25	41.753126, -72.699904	Hamilton St. Overpass – Park River	11/12/19	Bacteria	260	No
26	41.752954, -72.699249	Hamilton & Brookfield	11/12/19	Bacteria	430	Yes
27	41.750905, -72.702500	Olive & Brookfield	11/12/19	Bacteria	100	No
28	41.750313, -72.710999	New Park Avenue	11/12/19	Bacteria	1,700	Yes
29	NA	<i>On-ramp for I-84 East off Flatbush Ave. Identified as a CTDOT outfall</i>	10/12/20	NA	NA	NA
30	41.742803, -72.710297	<i>Flatbush Ave and William Shorty Campbell St</i>	10/12/20	Bacteria	940	Yes

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31	41.742819, -72.710265	<i>Flatbush Ave Overpass</i>	10/12/20	Bacteria	4,000	Yes
32	41.742827, -72.710147	<i>Flatbush Ave. Overpass and Brookfield St.</i>	10/12/20	Bacteria	940	Yes
33	41.743299, -72.706617	<i>Flatbush Ave. (by new Prince Technical School)</i>	10/12/20	Bacteria	370	No
34	41.742371, -72.708602	<i>Brookfield St - Park River, South Branch</i>	10/12/20	Bacteria	920	Yes
35	41.741730, -72.709976	<i>William Shorty Campbell St</i>	10/12/20	Bacteria	880	Yes
36	41.739953, -72.709536	<i>William Shorty Campbell St</i>	10/12/20	Bacteria	420	Yes
37	NA	<i>Park River – South Branch by Clermont St.</i> <i>Inaccessible</i>	10/12/20	Bacteria	NA	NA
38	41.737647, -72.712325	<i>John D Wardlaw Way</i>	10/12/20	Bacteria	<50	No
39	41.734293, -72.713934	<i>Newfield & Dexter (A)</i>	10/12/20	Bacteria	3,700	Yes
40	NA	<i>Newfield & Dexter (B)</i> <i>inaccessible</i>	10/12/20	Bacteria	NA	NA
41	41.738414, -72.665957	<i>Airport Road & 91S (exit 27)</i>	10/12/20	Bacteria	1,100	Yes
42	41.733859, -72.667799	<i>Ledyard Street</i>	10/12/20	Bacteria	39,000	Yes
44	41.733859, -72.667799	<i>Folly Brook Dike</i>	10/12/20	Bacteria	39,000	Yes
45	41.793726, -72.709175	<i>North of Annie Fisher School</i>	10/12/20	Bacteria	<50	No
	41.791623, -72.709389	<i>South of Annie Fisher on Mark Twain</i>	10/12/20	Bacteria	<50	No

*Per Section 6(i)(1)(8) of the General Permit, the outfall shall be identified for follow-up investigation if E. Coli result is greater than 410 col/100ml. If the permittee can document that bacteria levels at an outfall that exceed these levels are solely the result of natural sources of bacteria, they are not required to conduct a follow-up investigation for that outfall. Natural sources may include wildlife or runoff from undeveloped wooded areas but do not include pet waste or waterfowl congregating at parks, ponds or other attractive nuisance areas.

**Outfall is located underground into Park River Conduit

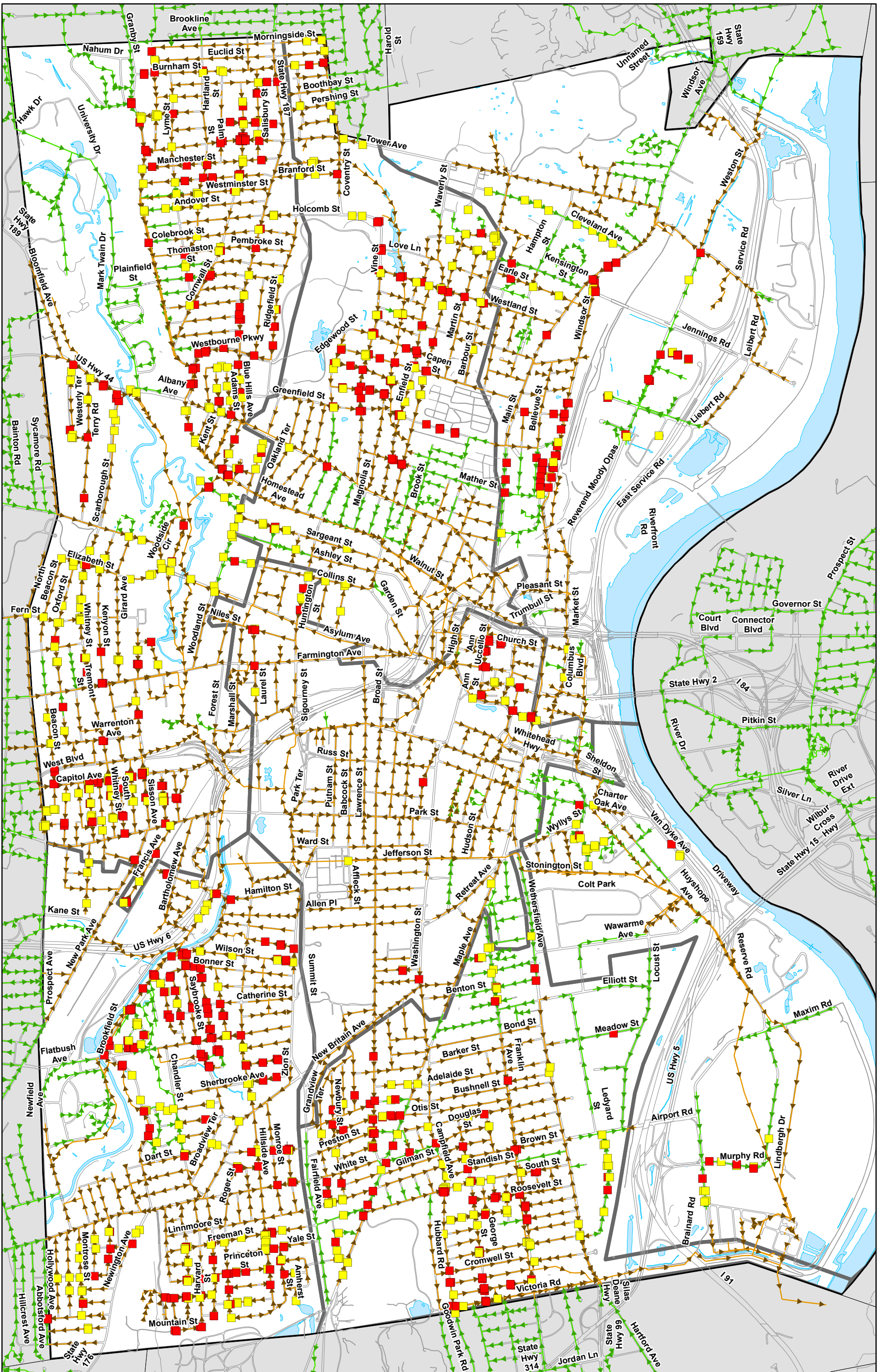
Section 6(i)(1)(D) Follow-up investigations



Provide the following information for outfalls exceeding the pollutant threshold.

Outfall ID	Status of drainage area investigation	Control measure to address impairment
None		

For 2023, MDC did not conduct any follow-up investigations.

**ATTACHMENT A
2022 VS 2023 CATCH BASIN CLEANING ANALYSIS**




 0 1,000 2,000 4,000 Feet
 
 ■ Catch basin with 50% (or more) accumulation from 2022 to 2023
 ■ Catch basin with 25% to 50% accumulation from 2022 to 2023

The Metropolitan District
2022 vs 2023 Catch Basin Cleaning Analysis
 April 2024