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DIRECTOR OF OPERATIONS
ERNEST ORGERA



TRAFFIC & ROAD MAINTENANCE SUPERVISOR
THOMAS TURK

OPERATIONS SUPERVISOR
DOUG HOYT

CITY OF STAMFORD
OFFICE OF OPERATIONS
HIGHWAY DEPARTMENT

September 27, 2013

Stormwater Permit Coordinator
Bureau of Water Management
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Re: Permit ID CT0030279 Annual Report 2012

Dear Stormwater Permit Coordinator,

Please find attached the 2012 Annual MS4 Report from the City of Stamford.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ernie Orgera", is written over the word "Sincerely,".

Ernie Orgera
Director of Operations
City of Stamford
888 Washington Boulevard
Stamford, CT 06901

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MS4 Annual Report – Permit CT0030279
January 1, 2012 to December 31, 2012

Contact Information:

- Ernie Orgera, Director of Operations, City of Stamford, Stamford Government Center, 888 Washington Blvd, Stamford, CT 06901 Phone: 203-977-4141
- Thomas Turk, Traffic and Road Maintenance Supervisor, City of Stamford, Highways Department, 90 Magee Ave, Stamford, CT 06902 Phone: 203-977-5919
- Marie Sabo, Laboratory Director, Stamford WPCA, 111 Harbor View Ave., Stamford, CT 06902, Phone: 203-977-4964
- Steven Pietrzyk, Regulatory Compliance Officer, Stamford WPCA, 111 Harbor View Ave., Stamford, CT 06902, Phone: 203-977-5768
- Doug Hoyt, Operations Supervisor, , City of Stamford, Highways Department, 90 Magee Ave, Stamford, CT 06902 Phone: 203-977-5024
- Kevin Murray, Parks and Recreation, Stamford Government Center, 888 Washington Blvd, Stamford, CT 06901 Phone: 203-977-4606
- Mike Sullivan, E. Gaynor Brennan Golf Course, Stamford Government Center, 888 Washington Blvd, Stamford, CT 06901 Phone: 203-977-5694

Overall Objective of Stormwater Management Program

The objective of the Stamford MS4 Permit is to educate and heighten public awareness to improve the management of stormwater and thereby reduce pollution from runoff throughout the City of Stamford protecting water quality in all receiving waters.

A. Major Findings:

1. There is still a great need to continue educating various City Departments and government officials on the importance of stormwater management and permit compliance.
2. There is still a great need to continue educating the public to understand the impact of stormwater runoff on the environment.
3. There are continuing budget and staffing needs that need to be met in order for the City to be efficient at managing all the aspects of the MS4 permit.

B. Stormwater Management Program Strengths:

1. Strong program in public education for students and adults.
2. Excellent working relationship with the Department of Energy and Environmental Protection staff.
3. A willingness of interdepartmental coordination aimed at not only MS4 Permit compliance but for stormwater management improvements overall.
4. Multiple capital projects either underway or being created to deal with stormwater drainage issues.

C. Stormwater Management Program Weaknesses:

1. The significant changes in procedure and leadership in recent years have made it difficult for any one group, within the City, to take full control of the stormwater management issue and coordinate not only future efforts but current efforts at complying with the MS4 permit.
2. A better understanding of the scope and staff required for managing the stormwater program is needed by our elected officials and boards in order to obtain the proper operating budgets for the City to be compliant on a year to year basis.

D. History and Future Direction of Stormwater Management Program:

History: At the end of 2011 there was a changing of the guard in that the WPCA was to no longer manage the stormwater program. It was determined that stormwater is outside the purview of the WPCA, and that the revenue generated by the WPCA could not be used for

stormwater issues because direct responsibility lies with the City. Subsequently, the MS4 Permit was assigned to the Office of Operations. There was a Clerk of the Works that was initially assigned to the Stormwater Management Program because of his involvement with the catch basin cleaning and street sweeping documentation, from the Highways Department, used in previous MS4 annual reports. The full responsibility of the MS4 Permit fell upon the City of Stamford Highways Department. Working with the Clerk of the Works, efforts were made to acquire the budget, staff and means to comply not only with the current MS4 permit in effect at the time but also with the new permit that was to be issued, which had been discussed to be filled with much more responsibilities than previous permits.

On October 29, 2012 Hurricane Sandy hit the northeast. The damage caused to Stamford resulted in 30,000 tons of debris having to be cleaned off the streets and 100,000 tons of sand relocated back to the beaches from where it was pushed 100 yards inland. The cleanup efforts literally began during the storm as trees began to fall and continued full force until the end of April of 2013. The Highways Department was the backbone of the cleanup efforts with its manpower and equipment stretched to its limits in an effort to bring normalcy back to the City. This “100 year storm” stalled the MS4 Permit compliance efforts that were underway in 2012.

Future: The future of compliance and efficient execution of the MS4 permits lies with proper budgeting and staffing. It is clear that this cannot be done with the efforts of one person. As the recently issued MS4 permit states, a team is needed to comply with all the requirements and more importantly ensure that the receiving bodies of water from the stormwater system are maintained and protected.

E. Narrative:

Many City Departments have stormwater control responsibilities. For example:

- Highways Department is responsible not only for implementing the MS4 Permit but also cleaning and maintaining storm sewers and catch basins. Also, they are tasked with sweeping the streets of the City on a regular basis.

- Engineering Department is responsible for replacing beyond repair storm sewers and catch basins. They are also involved in solving major drainage issues that arise from broken pipes and various environmental issues.
- Parks Department is responsible for park maintenance including fertilizer use.
- Golf Course Superintendent is responsible for the golf course and the use of fertilizers and pesticides.
- Environmental Protection Board and the Engineering Bureau are responsible for ensuring that stormwater BMP's are designed into projects.
- WPCA Laboratory was responsible for monitoring but has since been contracted by the City to run and maintain the stormwater pump stations throughout the City.

2012 Program Specifics

MS4 Permit Renewal: The renewal process was still ongoing throughout 2012 and was still in the hands of the DEEP as of the end of 2012.

Budgeting and Staffing: Activities pertaining to the MS4 permit were being carried out by various departments throughout the City. The WPCA used to be the one that would bring all the efforts together. Since the WPCA was no longer allowed to use funds for stormwater issues their Stormwater Management account was defunded for the 2012/2013 fiscal year. The budget and staffing needs for compliance were unclear because of the renewal process of the permit.

In anticipation of a more demanding permit a budget was drafted containing the operational costs of maintaining a dedicated office and staff, including workers for cleaning out the catch basins. The rough estimate was \$2.2 million per year, not including the acquisition costs for 6 new vacuum trucks for catch basin cleaning which would be around another \$2 million in capital costs. There are existing capital accounts that have work that may pertain to issues included in the MS4 permit. Coordinating those funds and efforts should help offset some of the new budgetary demands. A final budget had yet to be established by the end of 2012.

We also had CDM Smith prepare a cost estimate for the work described in a draft of the MS4 permit which came to \$935,700.00 annually. This is not included in the \$2.2 million operating budget described above.

Sampling: The WPCA did the sampling for previous permits. Once they relinquished responsibility to the City the sampling process suffered. In an effort to be in compliance the City has contracted the WPCA, because of their familiarity of the process, to take the needed samples for the 2012 annual report. Sample results will follow as soon as they are available.

GIS/GPS Program: The WPCA is spearheading the efforts to map all the piping, manholes and catch basins throughout the city. Once they were officially separated from the City they turned their focus on the sanitary portion of the project. That being said the mapping of the stormwater piping and basins was still part of the project and continues to be. Funding wasn't secured for the project until the middle of 2012 and by the end of 2012 they were approximately at 10% with the stormwater portion of the project.

Stormwater Ordinance: There have been discussions with the City's law department regarding the process of creating new ordinances to allow enforcement of the rules and regulations described in the new MS4 permit. There has not been a final determination at this point. There may be an outside environmental lawyer contracted to draft the ordinances using their environmental knowledge to ensure the wording is sufficient for full enforcement.

General Permits: There has been work done for the *General Permit for Stormwater Discharges Associated with Industrial Activities*. The main City locations that fall under this designation are the WPCA, Solid Waste Transfer Station, Highways (which encompasses the Vehicle Maintenance garage and the Recycling Center), Town Yard Garage which has a salt dome, The Scofield Yard which has a salt dome, Police Department Maintenance Garage and the Fire Department Maintenance Garage. The work done at the Fire Department Maintenance Garage may be consolidated into the City's main Vehicle Maintenance Garage which may eliminate the need to have a permit for that site. Efforts to meet all obligations and be in full compliance are underway.

Public Education Program: As in previous years public education on stormwater issues are included in all WPCA tours. The tours held in 2012 exceeded the visitor count of the 2011 tours by 500 people. This

A high profile renovation of the Mill River area in downtown also helped bring stormwater issues to light. CDM Smith created a presentation towards the end of 2012 which was to be presented to City employees first so they would be familiar with the information and could answer questions once the presentation was given to the public. There were also plans to include a leaflet, based on the presentation, in the next WPCA billing cycle to reach as many people as possible. There were also discussions of creating a class for contractors, such as landscaper and grounds keepers, on what things are and are not allowed under the permit. Things like proper disposal of grass clippings and what type and what amounts of fertilizers should be used.