

## How to complete the MS4 Annual Report template

(for “Existing” Permittees that originally registered for the 2004 MS4 general permit)

### General Instructions

- Text highlighted yellow represents generic text to be updated.
- Example responses are provided in red text.
- Blue text specifies if a section is only required in certain reporting years.

### Completing Part I: Summary of Minimum Control Measure (MCM) Activities

- Best Management Practice (BMP) Summary tables: Each MCM section starts with a BMP Summary table. A description of what to include in each column is below.

**BMP**: Self-explanatory.

**Status**: Provide status of BMP implementation (not started, ongoing/in progress, complete).

**Activities in current reporting period**: Describe ongoing and completed BMP activities and their status (Not started, ongoing, or completed). Briefly explain if you’re on schedule to meet the deadline or not. If not, explain why you don’t expect to meet the deadline.

**Measurable Goal**: Provide a measurable goal for the BMP.

**Dept/Person Responsible**: Identify the lead department and responsible person for that BMP. Note if it changed from the previous year. Third parties may be listed here if they are implementing the BMP but the permittee retains responsibility for tracking the BMP.

**Due**: BMP deadline from permit.

**Date completed / projected completion date**: Actual BMP completion date or when it’s scheduled to be completed.

**Additional details**: Add any additional details including reasons for overdue BMPs, specific location of BMP is applicable, reason for adding an additional BMP.

- Other Tables: Each MCM has specific data reporting requirements. Brief descriptions and/or example responses are provided for each requirement.

**Completing Part II: Impaired waters investigation and monitoring [This section required beginning in 2018]**

- Brief instructions are provided for each reporting requirement throughout Part III.

- For Section 2.1 and 2.2, follow-up investigation required (last column) if the following pollutant thresholds are exceeded:

<b>Pollutant of concern</b>	<b>Pollutant threshold</b>
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

**Completing Part III: Additional IDDE Program Data [This section required beginning with 2018 Annual Report]**

- Brief instructions are provided for each reporting requirement throughout Part IV.

**Completing Part IV: Certification - Self-explanatory**

**MS4 General Permit**  
**Town of Wolcott 2019 Annual Report**  
**Existing MS4 Permittee**  
**Permit Number GSM -000033**  
**[January 1, 2019 – December 31, 2019]**

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This report documents the Town of efforts to comply with the conditions of the MS4 General Permit to the maximum extent practicable (MEP) from January 1, 2019 to December 31, 2019.

**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	On Going	Maintain SWM Information on Town's Website	Update Website	Mayor's Office/ Amy Desaulniers	Jul 1, 2018	Held Public Meeting on SWM on June 29, 2017	
1-2 Address education/ outreach for pollutants of concern*	On Going	Maintain Brochures on SWM Practices on Town Website and at Town Hall and Library	Maintain and Distribute Brochures	Inland Wetlands Office/Dede Distiso	Jul 1, 2018		
1.3 Outreach to Business	In Progress	Gathering and reviewing stormwater management alternatives for business types	Develop information Brochures for business types	Engineering Dept/ Mark Possidento	6/19	Placed SWM Reduction Information on website 6/19	

1-4 Workshop for Construction Industry	<i>In Progress</i>	<i>Developing workshop materials/videos</i>	Workshop conducted for construction industry	<i>Planning and Zoning Office/ David Kalinowski</i>	6/19		
1.5 Education Town Commissions	<i>In Progress</i>	<i>Attend Commission Meetings and describe programs</i>	Commissions Visited	<i>Engr Office/ Mark Possidento</i>	6/19	<i>Expect to complete presentation to all commissions in 2019</i>	

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

Will pursue involvement of High School students in SWM.

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

<b>Program Element/Activity</b>	<b>Audience (and number of people reached)</b>	<b>Topic(s) covered</b>	<b>Pollutant of Concern addressed (if applicable)</b>	<b>Responsible dept. or partner org.</b>
<i>Public Meeting on SWM (January 29, 2017)</i>	30	<i>Present SWM for Wolcott, CT</i>	<i>overall</i>	<i>Engr. Office/Inlands</i>

## 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	On going	SWM Public Notice	Completed plan/notice	Engr./Mark Possidento	Apr 3, 2017	4/17	Held Public Hearing on June 26, 2017
2-2 Comply with public notice requirements for Annual Reports	On going	Annual SWM notice	Complete notice	Engr./Mark Possidento	Feb 15, 2019	2/2019	
Establish SWM Committee	completed	Established committee/Held meeting	Establish committee	Engr./Mark Possidento	6/17	6/17	

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

<i>Hold semiannual stormwater committee meetings to review SMP implementation progress. In Fall 2019</i>
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### 2.3 Public Involvement/Participation reporting metrics

Metrics	Implemented	Date	Posted
Availability of the Stormwater Management Plan announced to public	(y)	6/17/6/18/6/19	(Town Hall/Library Wolcottct.org)
Availability of Annual Report announced to public	(y)	2/15/20	(Town Hall/Library Wolcottct.org)

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

### 3.1 BMP Summary



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

Will continue to map outfalls, Developed procedure to put outfalls on Town GIS System.

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

Date of Report	Location / suspected source	Response taken
none		

**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)
None reported or recorded						

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

Illegal discharges has been reported in the past, which have been recorded.

**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
<i>Reviewing last 6 years of Septic Failures from Chesprocott Health District to determine areas of concerns</i>		

**3.7 IDDE reporting metrics**

Metrics	
Estimated or actual number of MS4 outfalls	200
Estimated or actual number of interconnections	?
Outfall mapping complete	(50%)
Interconnection mapping complete	(0%)
System-wide mapping complete (detailed MS4 infrastructure)	(50%)
Outfall assessment and priority ranking	(0)
Dry weather screening of all High and Low priority outfalls complete	0
Catchment investigations complete	500
Estimated percentage of MS4 catchment area investigated	50%

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).

**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	In Progress	Reviewing existing regulation	Implement	Engr Office/Mark Possidento	Jul 1, 2019	Will complete by due date	Completed 6/19
4-2 Develop/Implement plan for interdepartmental coordination in site plan review and approval	ongoing	Town already had coordinated program for interdepartmental	Continue interdepartmental review	Engr Office/Mark Possidento	Jul 1, 2017	complete	
4-3 Review site plans for stormwater quality concerns	ongoing	review	Continue interdepartmental review	Engr Office/Mark Possidento	Jul 1, 2017	complete	
4-4 Conduct site inspections	on going	review	Continue interdepartmental review	Engr Office/Mark Possidento	Jul 1, 2017	complete	
4-5 Implement procedure to allow public comment on site development	on going	Subdivision regs required public notice	Continue present procedure	Planning & Zoning/David Kalinowski	Jul 1, 2017	complete	
4-6 Implement procedure to notify developers about DEEP construction stormwater permit	On going	Subdivision regs require compliance with State Stormwater guidance	Continue present procedure	Planning & Zoning/David Kalinowski	Jul 1, 2017	complete	

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

Will develop a list of contractors who work in Wolcott-Send Letter and brochure Re: SWM.

**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	Not started				Jul 1, 2021		
5-2 Enforce LID/runoff reduction requirements for development and redevelopment projects	n/a				Jul 1, 2019		
5-3 Identify retention and detention ponds in priority areas	In progress	Identify and mapped 12 ponds		Engr. Office	Jul 1, 2019	9/19	
5-4 Implement long-term maintenance plan for stormwater basins and treatment structures	In progress	Determining ownership Retentions basins		Engr. Office	Jul 1, 2019		

5-5 DCIA mapping	<i>Not started</i>				Jul 1, 2020		
5-6 Address post-construction issues in areas with pollutants of concern	<i>Not started</i>				Not specified		

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

**5.3 Post-Construction Stormwater Management reporting metrics**

Metrics	
Baseline (2012) Directly Connected Impervious Area (DCIA)	Acres (?)
DCIA disconnected (redevelopment plus retrofits)	acres this year / acres total (?)
Retrofits completed	#(?)
DCIA disconnected	% this year / % total since 2012 (?)
Estimated cost of retrofits	\$(?)
Detention or retention ponds identified	12/12

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

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**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	on going	Employees are trained on regular basis	Continue training	Public Works /David Kalinowski	Jul 1, 2017	Training held for Public works staff 12/19	
6-2 Implement MS4 property and operations maintenance	In progress	Developing O&M procedures	O&M		Jul 1, 2018		
6-3 Implement coordination with interconnected MS4s	Not started				Not specified		
6-4 Develop/implement program to control other sources of pollutants to the MS4	Not started				Not specified		
6-5 Evaluate additional measures for discharges to impaired waters*	Not started				Not specified		
6-6 Track projects that disconnect DCIA	Not started				Jul 1, 2017		

6-7 Implement infrastructure repair/rehab program	<i>Not started</i>					Jul 1, 2021		
6-8 Develop/implement plan to identify/prioritize retrofit projects	<i>Not started</i>					Jul 1, 2020		
6-9 Implement retrofit projects to disconnect 2% of DCIA	<i>Not started</i>					Jul 1, 2022		
6-10 Develop/implement street sweeping program	<i>In progress</i>	<i>Working with Public Works to develop and implement program</i>	<i>Implement Program</i>	<i>Public Works</i>		Jul 1, 2017	<i>Established Program 6/19</i>	
6-11 Develop/implement catch basin cleaning program	<i>In progress</i>	<i>Working with Public Works to develop and implement program</i>	<i>Implement Program</i>	<i>Public Works</i>		Jul 1, 2020	<i>Established Program 6/19</i>	
6-12 Develop/implement snow management practices	<i>In progress</i>	<i>Working with Public Works to develop and implement program</i>	<i>Implement Program</i>	<i>Public Works</i>		Jul 1, 2018	<i>Established Program 6/19</i>	
<b>Example additional BMP:</b> 6-13 Map & Inventory highly erosive areas in town ROW	<i>Not started</i>	<i>Collect information on eroding areas in ROW from highway maintenance personnel over course of normal operations</i>	<i>ID areas contributing large volume of sediment to town waterbodies</i>	<i>Public Works</i>	-	Jul 1, 2020	<i>Reason for addition: Reduce sedimentation of waterways near town ROWs</i>	

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

Will develop programs for street sweeping, catch basin cleaning and snow management this year. Implementation may be inhibited by Town Budget.

**6.3 Pollution Prevention/ Good Housekeeping reporting metrics**

<b>Metrics</b>	
Employee training provided for key staff	yes
Street sweeping	Yes 7/10/17
Curb miles swept	62 miles
Volume (or mass) of material collected	8 tons
<b>Catch basin cleaning</b>	
Total catch basins in priority areas	# 160
Total catch basins in MS4	#1000
Catch basins inspected	# 500
Catch basins cleaned	# 44
Volume (or mass) of material removed from all catch basins	tons 3
Volume removed from catch basins to impaired waters (if known)	n/a
<b>Snow management</b>	
Type(s) of deicing material used	Salt-Ultra melt liquid
Total amount of each deicing material applied	1000 ton /20,000 gal per year
Type(s) of deicing equipment used	Sprayers/sanders
Lane-miles treated	108 miles
Snow disposal location	
Staff training provided on application methods & equipment	(y) (12-19-2019)
Municipal turf management program actions (for permittee properties in basins with N/P impairments)	n/a
Reduction in application of fertilizers (since start of permit)	n/a
Reduction in turf area (since start of permit)	n/a
Lands with high potential to contribute bacteria (dog parks, parks with open water, & sites with failing septic systems)	
Cost of mitigation actions/retrofits	\$

**6.4 Catch basin cleaning program**

Briefly describe the method used to optimize your catch basin inspection and cleaning schedule. [Complete this section for the 2017 Annual Report only]

**6.5 Retrofit program**

Briefly describe the Retrofit Program identification and prioritization process, the projects selected for implementation, the rationale for the selection of those projects and the total DCIA to be disconnected upon completion of each project. [Provide information if available in 2017 report. Section to be completed for the 2019 Annual Report.]

**Not started**

Describe plans for continuing the Retrofit program and how to achieve a goal of 1% DCIA disconnection in future years. [Provide information if available in 2017 report. Section to be completed for the 2019 Annual Report.]

**Not started**

Describe plans for continuing the Retrofit program beyond this permit term with the goal to disconnect 1% DCIA annually over the next 5 years. [Provide information if

**available in 2017 report. Section to be completed for the 2019 Annual Report.]**

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**Part II: Impaired waters investigation and monitoring [This section required beginning with 2018 Annual Report]**

**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 x      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.

Conducted stormwater sampling and analysis of 3 outfalls to Hitchcock Lake. No violations of Bacteria standard found. (Results attached to Annual Report) Identified 25 outfalls in priority area (Hitchcock Lake and Lily Brook Watersheds). Rainfall events did not allow sampling in fall. Will sample in Spring 2020.

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

**2.1 Screening data collected under 2017 permit**

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?
OF-LS	12/12, 5/13 10/14	Bacteria, Caffeine	ND,ND	CTL	Yes/2020
OF-PL	"	"	"	"	"
OF-CR	"	"	"	"	"

**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	Results	Name of Laboratory (if	Follow-up required?
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		Other pollutant of concern)		used)	

### 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

### 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)

**Part III: Additional IDDE Program Data [This section required beginning with 2018 Annual Report]**

**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

**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

**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

**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

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.



**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:	Print name:
Signature / Date:	Signature / Date:

Date Samples Received: 12/10/12

Client Name : <b>Town of Wolcott</b>	CTL Lab No. : 1212150
Report Date : 12/14/12	PO/ Job No. : NA

**RESULTS OF ANALYSIS**

Standard Methods 9222B/9222G

Date Analyzed: 12/10/12

Matrix Type :	W	W	W	W
CTL Sample No.:	18096	18097	18098	18099
Field ID :	Outfall	CB 35	Maple Storm E	Maple Storm D

Parameters	RL				
Fecal Strep/100ml	100	ND	ND	ND	ND
Fecal Coliform/100ml	100	400	ND	ND	100
E. Coli/100ml	100	400	ND	ND	100

RL= Reporting Limit ND= Not Detected

Matrix Type: W= Water/Aqueous S= Soil/Solid O= Oil/Hydrocarbon

Connecticut Testing Laboratories, Inc.  
165 Gracey Avenue / Meriden, CT 06451  
(203) 634-3731 (Fax) 630-1336  
Certification CT-PH0547/ MA-CT035

Date Samples Received: 05/08/13

Client Name : <b>Mark Possidento</b>	CTL Lab No. : 0513133
Report Date : 05/15/13	PO/ Job No. : NA
	Date Analyzed: 05/14/13

**RESULTS OF ANALYSIS**

**EPA Method 625**

<b>Matrix Type :</b>	<b>W</b>	<b>W</b>	<b>W</b>
<b>CTL Sample No.:</b>	<b>6083</b>	<b>6084</b>	<b>6085</b>
<b>Field ID :</b>	<b>OF-LS</b>	<b>OF PL</b>	<b>OF CR</b>
	<b>Hitchcock</b>		

<b>Parameters</b>	<b>RL</b>				
Caffeine-ug/L	1.0	ND	ND	ND	

RL= Reporting Limit ND= Not Detected

Matrix Type: W= Water/Aqueous S= Soil/Solid O= Oil/Hydrocarbon

**Connecticut Testing Laboratories, Inc.**  
165 Gracey Avenue / Meriden, CT 06451  
(203) 634-3731 (Fax) 630-1336  
Certification CT-PH0547/ MA-CT035

Date Samples Received: 10/06/14

Client Name : <b>Mark Possidento</b>	CTL Lab No. : 1014111
Report Date : 10/16/14	PO/ Job No. : Town of Wolcott
	Date Analyzed: 10/16/14

**RESULTS OF ANALYSIS**

**EPA Method 625**

<b>Matrix Type :</b>	<b>W</b>	<b>W</b>	<b>W</b>
<b>CTL Sample No.:</b>	<b>15102</b>	<b>15103</b>	<b>15104</b>
<b>Field ID :</b>	<b>OF PL</b>	<b>OF CR</b>	<b>OF-LS</b> <b>Pine St.</b>

<b>Parameters</b>	<b>RL</b>				
Caffeine-ug/L	10	ND	ND	ND	

RL= Reporting Limit ND= Not Detected

Matrix Type: W= Water/Aqueous S= Soil/Solid O= Oil/Hydrocarbon

**Connecticut Testing Laboratories, Inc.**  
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