Stormwater Pollution Prevention Plan

Ensign-Bickford Aerospace & Defense Company Facility

640 Hopmeadow Street
Simsbury, Connecticut

Prepared for:

Ensign-Bickford Aerospace & Defense Company

Prepared by:

EHS Support℠

March 2026

SWPPP Amendment Record

Revision Number	Date	Notes
1	July 2011	
2	March 2026	Revised to comply with 2025 IGP

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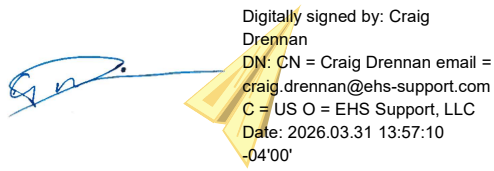
Permittee Certification

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, under Section 53a-157b of the Connecticut General Statutes, and in accordance with any other applicable statute.

Name:	Sharon Locandro Ensign-Bickford Aerospace & Defense Company
Title:	Manager, Safety & Regulatory Compliance Lead
Signature:	
Date:	March 31, 2026
Facility Name & Address:	Ensign-Bickford Aerospace & Defense Company 640 Hopmeadow Street, Simsbury CT, 06070 *and* 100 Gristmill Road, Simsbury CT, 06070
General Permit Number:	CTR050000

Qualified Professional Certification

I certify that I have thoroughly and completely reviewed the Stormwater Pollution Prevention Plan prepared for the site or facility known as the Ensign-Bickford Aerospace & Defense Company Simsbury Manufacturing Facility. I further certify, based on such review and site visit by myself or my agent, and on my professional judgment, that the Stormwater Pollution Prevention Plan meets the criteria set forth in the General Permit for the Discharge of Stormwater Associated with Industrial Activity. 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 the submitted information may be punishable as a criminal offense, in accordance with Section 22a-6 of the Regs. Conn. State Agencies, pursuant to Section 53a-157b of the Regs. Conn. State Agencies, and in accordance with any other applicable statute.

Name:	Craig Drennan, PE, CFM EHS Support, LLC
Title:	Water Resources Practice Lead
Signature:	
Date:	March 31, 2026
Facility Name & Address:	Ensign-Bickford Aerospace & Defense Company 640 Hopmeadow Street, Simsbury CT, 06070 *and* 100 Gristmill Road, Simsbury CT, 06070
General Permit Number:	CTR050000

Certification of Non-Stormwater Discharges

I certify that, in my professional judgment, the stormwater discharge from the site or facility known as Ensign-Bickford Aerospace & Defense Company Simsbury Manufacturing Facility consists only of stormwater, or of stormwater combined with wastewater authorized by an effective permit issued under Section 22a-430 or Section 22a-430b of the Connecticut General Statutes, including the provisions of the IGP for the Discharge of Stormwater Associated with Industrial Activity, or of stormwater combined with any of the following discharges, provided they do not contribute to a violation of water quality standards.

This certification is based on testing and/or evaluation of the stormwater discharge from the site. I further certify that all potential sources of non-stormwater at the site, a description of the results of any test and/or evaluation for the presence of non-stormwater discharges, the evaluation criteria or testing method used, the date of any testing and/or evaluation, and the on-site drainage points that were directly observed during the test have been described in detail in the Stormwater Pollution Prevention Plan prepared for the site. I further certify that no interior building floor drains exist unless such floor drain connection has been approved and permitted by the commissioner or otherwise authorized by a local authority for discharge as domestic sewage to a sanitary sewer.

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 the submitted information may be punishable as a criminal offense, in accordance with Section 22a-6 of the General Statutes, pursuant to Section 53a-157b of the General Statutes, and in accordance with any other applicable statute.

Name:	Craig Drennan, PE, CFM EHS Support, LLC
Title:	Water Resources Practice Lead
Signature:	Digitally signed by: Craig Drennan DN: CN = Craig Drennan email = craig.drennan@ehs-support.com C = US O = EHS Support, LLC Date: 2026.03.31 13:57:25 -04'00'
Date:	March 31, 2026
Facility Name & Address:	Ensign-Bickford Aerospace & Defense Company 640 Hopmeadow Street, Simsbury CT, 06070 *and* 100 Gristmill Road, Simsbury CT, 06070
General Permit Number:	CTR050000

Acronyms

AR	Annual Report
BMP	best management practice
CAP	Corrective Action Procedure
CFR	Code of Federal Regulations
CTDEEP	Connecticut Department of Energy and Environmental Protection
EH&S	environmental, health, and safety
IGP	Industrial General Permit
IWQR	Integrated Water Quality Report
LC_{50}	median lethal concentration
mg/L	milligram per liter
S.U.	standard unit
SIDP	Substantially Identical Discharge Point
SMR	Stormwater Monitoring Report
SWPPP	Stormwater Pollution Prevention Plan
TMDL	Total Maximum Daily Loads
USEPA	United States Environmental Protection Agency

1 Introduction

1.1 Purpose and Scope

This Stormwater Pollution Prevention Plan (SWPPP) has been prepared for Ensign-Bickford Aerospace & Defense Company ("EBAD") for the manufacturing operations located in Simsbury, Connecticut (the Facility or Site) in response to the requirements of Section 22a-430b of the Connecticut General Statutes.

The primary purpose of this SWPPP is to document procedures associated with the storage and disposal of materials, in order to prevent and/or minimize contact of toxic/hazardous materials with stormwater. This SWPPP addresses the requirements of the General Permit for the Discharge of Stormwater Associated with Industrial Activity (Industrial General Permit [IGP]) reissued on October 1, 2025.

The Connecticut Department of Energy and Environmental Protection (CTDEEP) requirements concerning the preparation and use of this SWPPP are presented in Section 4.3 of the IGP. EBAD will keep this SWPPP current by making appropriate modifications whenever there is a change at the Site that affects the potential to cause pollution of the waters of the state or whenever the actions required by the SWPPP fail to adequately protect against pollution of waters of the state. EBAD will make a copy of the SWPPP available to the Commissioner of CTDEEP immediately upon request by that agency.

A copy of the registration under the new IGP is provided as **Appendix A**. The general permit may be found online (https://portal.ct.gov/deep/water-regulating-and-discharges/stormwater/industrial-stormwater-gp).

The following sections discuss specific requirements as they relate to processes and practices.

2 Site Description and Contact Information

2.1 Facility Description

The Facility is located on approximately 379 acres of land in the central part of Simsbury, Connecticut. EBAD is co-located on the property with Dyno Nobel, Inc. ("DNI"). Since May 2, 2003, the Facility complex has been owned by Simsbury Hopmeadow Street, LLC ("SHS"). EBAD leases portions of the Facility complex from SHS. This SWPPP addresses only those activities and buildings under the direct control of EBAD. DNI manages industrial stormwater runoff from portions of the Facility under its control under separate CTDEEP General Permit registrations and under a separate SWPPP. A locus map of the Facility is provided on **Figure 1**.

The main portion of the Facility is located east of Hopmeadow Street and west of the abandoned Penn Rail Road line, which runs parallel to the Farmington River. The topography on the eastern portion of the Facility slopes gradually eastward toward the river. Hop Brook and several unnamed tributaries to the Farmington River also cross the property. Stormwater collection systems direct site runoff to the tributaries discharging into the Farmington River. Property abutting the Farmington River is within the Farmington River floodplain. As the Facility comprises two "Sites," or two distinct sets of contiguous parcels on which authorized activities occur and are separated by Hopmeadow Street (a publicly owned right-of-way), stormwater discharges from each Site are covered under separate General Permit registrations. However, as EBAD operates the Simsbury complex as one overall Facility, one master SWPPP has been developed to cover both Sites. **Table 1** identifies the registration details for each Site as covered under this SWPPP.

Table 1 EBAD Simsbury Facility Registrations

Facility Component	Registration Address	Permitted Outfalls	Size, Acres
East of Hopmeadow Street	640 Hopmeadow Street Simsbury CT, 06070	5	155
West of Hopmeadow Street	100 Gristmill Road Simsbury CT, 06070	1	224

EBAD manufactures explosive products, devices, and systems for various military programs. The principal significant raw materials used at the Facility are explosives, pyrotechnic mixes, metal jacketing (lead and aluminum tubes), braiding materials such as Kevlar, and stainless-steel wire and preconfigured articles. In the course of manufacturing explosive products, waste explosives are generated in the form of off-specification product, packaging materials, and explosive contaminated materials from laboratory, production, and maintenance procedures. These wastes, as with all wastes generated by EBAD, are managed in accordance with state and federal regulations. Explosive-contaminated wastewaters and pyrotechnic-contaminated wastewaters (generated on the east side of Hopmeadow Street) are treated in an on-site wastewater treatment plant operated by DNI prior to discharge to the Simsbury Sanitary Sewer System. The Standard Industrial Classification (SIC) code for the Facility is 3483, Ammunition, Except for Small Arms.

2.2 Stormwater Pollution Prevention Team

The Stormwater Pollution Prevention Team is responsible for implementing and maintaining stormwater pollution control procedures outlined in this SWPPP, including good housekeeping, preventive maintenance, spill prevention/response, inspections, employee training, and stormwater monitoring. The Stormwater Pollution Prevention Team includes employees of both manufacturing facilities located on the premises. Team members are listed in **Table 2**. At least one team member shall be present at the Facility or on call during all operational shifts.

Table 2 Stormwater Pollution Prevention Plan Team

Member	Title	Phone	Responsibilities
Sharon Locandro, Pollution Prevention Team Leader	Ensign-Bickford Aerospace & Defense Company *Manager, Safety & Regulatory Compliance*	860-843-1384	Oversees implementation of Stormwater Program, reviews SWPPP and other regulatory submittals
Benjamin Lazich, Pollution Prevention Team Member	Ensign-Bickford Aerospace & Defense Company *EH&S Specialist*	860-843-1632	Implements stormwater program, collects stormwater samples, conducts inspections and assessments as required
Michael Axler, Pollution Prevention Team Member	Ensign-Bickford Aerospace & Defense Company *Director, Operations*	860-843-1643	Oversees installation and implementation of stormwater management and spill prevention infrastructure
Keith Geldhauser, Pollution Prevention Team Member	Ensign-Bickford Aerospace & Defense Company *Manager, Facilities*	860-843-1335	Oversees installation and implementation of stormwater management and spill prevention infrastructure
Steven Reilly, Pollution Prevention Team Member	Ensign-Bickford Aerospace & Defense Company *Manager, Receiving, Inspection, & Material Control*	860-843-2538	Oversees installation and implementation of stormwater management and spill prevention infrastructure
Steven Thurston, Pollution Prevention Team Member	Ensign-Bickford Aerospace & Defense Company *Director, Energetics Engineering*	860-843-2171	Oversees installation and implementation of stormwater management and spill prevention infrastructure
Alexander Tomlinson, Pollution Prevention Team Member	Ensign-Bickford Aerospace & Defense Company *Assembly Manufacturing Manager*	860-843-1624	Oversees installation and implementation of stormwater management and spill prevention infrastructure

Each member of the Stormwater Pollution Prevention Team shall have ready access to either an electronic or paper copy of applicable portions of the IGP and this SWPPP. In addition, each member of the Pollution Prevention Team shall receive annual training on the contents of this SWPPP and their responsibilities as a member of the Stormwater Pollution Prevention Team. Annual training logs are included as **Appendix B** to this SWPPP and described further in **Section 5.8**.

3 Description of Potential Pollutant Sources

3.1 Drainage Areas

The stormwater conveyance system at this Facility includes 15 stormwater outfalls associated with industrial activity. Outfalls from the DNI Facility discharge to Hop Brook and the Farmington River. Hop Brook at the Facility is listed as a Class A Inland Surface Water; and was listed as "fully supporting" for all use classes in the 2022 Final and 2024 Draft Connecticut Integrated Water Quality Report (IWQR). The Farmington River at the Facility is listed as a Class B Inland Surface Water and was listed as "fully supporting" for all use classes in the same reports. Both waterbodies were included in the 2012 Connecticut Statewide Bacteria TMDL; however, neither are listed as impaired for any uses in the latest IWQR. As such, no impaired waterbody or TMDL monitoring is required for Facility discharges authorized by the IGP.

Drainage patterns and potential stormwater pollutant sources are described below and shown on **Figure 2A** and **Figure 2B**. Based on the size of the Facility, two separate figures have been prepared; **Figure 2A** depicts stormwater drainage on the eastern side of Hopmeadow Street, and **Figure 2B** shows stormwater drainage on the western side of Hopmeadow Street. These figures outline the approximate limits of stormwater drainage areas where industrial activities exposed to stormwater occur at the Facility. While industrial activity may occur on other portions of the Facility, it is anticipated the impacts to industrial stormwater quality would be limited to the following:

- Dust generation from the use and maintenance of unpaved and gravel/crushed stone roadways,
- Spills or other unplanned discharges of product and waste materials via overland vehicular transport, and
- Potential soil erosion due to normal roadway maintenance and improvement activities.

The locations of point source discharges, berms or other structural control measures to reduce pollutants in stormwater runoff, the locations where materials may be exposed to precipitation, and the locations of loading/unloading activities are shown on **Figure 2A** and **Figure 2B**. The drainage area size, impervious area, and estimated runoff coefficients are also provided in these figures. A description of the industrial activities occurring in each drainage area, as well as the pollutants potentially exposed to stormwater, are presented in **Section 3.1.1**.

3.1.1 Outfalls and Drainage Areas

Outfalls are presented in this document following the same numbering scheme used by DNI in their permit registration. However, as the CTDEEP filing system requires that outfalls for each registration follow sequential numbering, this section presents both the facility outfall naming (in bold) and CTDEEP numbering (in italics).

Outfall 002 *(East of Hopmeadow Street, Outfall 001)*
Outfall 002 drains approximately 1.6 acres through a concrete ditch located on the northern end of the property. The receiving water body for this discharge is an unnamed tributary to Hop Brook. Industrial activities occurring in this drainage area include interior material storage and handling, loading and unloading, vehicle parking, interior manufacturing and carpentry shops, facilities and maintenance, and research and development. Rooftop vents are outfitted with filters to prevent the discharge of particulate to rooftops. There is one exterior dumpster located in this drainage area for scrap metals;

this dumpster is kept shut at all times except during material transfer. Potential pollutants associated with industrial activities include oil and grease and solids from vehicles, and sand applied to paved surfaces during the winter months. No undue erosion was noted at the site.

Outfall 003 *(East of Hopmeadow Street, Outfall 002)*
Outfall 003 drains approximately 1 acre through a 10-inch ceramic pipe located on the northern end of the property. The receiving water body for this discharge is Hop Brook. Industrial activities occurring in this drainage area include interior material storage and handling, loading and unloading, vehicle parking, and interior testing and production processes. There are two exterior dumpsters located in this drainage area; these dumpsters are kept shut at all times except during material transfer. Rooftop vents are outfitted with filters to prevent the discharge of particulate to rooftops. Potential pollutants associated with industrial activities include oil and grease and solids from vehicles and sand applied to paved surfaces during the winter months. No undue erosion was noted at the site.

Outfall 004 *(East of Hopmeadow Street, Outfall 003)*
Outfall 004 drains approximately 1.6 acres through a 6-inch PVC pipe located on the northern end of the property, east of Building 36. The receiving water body for this discharge is Hop Brook. Industrial activities occurring in this drainage area include interior administration offices, material storage and handling, and interior electronics assembly processes. There are no exterior dumpsters or rooftop vents. Potential pollutants associated with industrial activities include oil and grease and solids from vehicles and sand applied to paved surfaces for deicing/anti-icing purposes during the winter months. No undue erosion was noted at the site.

Outfall 005 *(East of Hopmeadow Street, Outfall 004)*
Outfall 005 drains approximately 3.2 acres through multiple small discharge pipes located on the eastern end of the property. The receiving water body for this discharge is Hop Brook. Industrial activities occurring in this drainage area include interior material storage and handling, interior manufacturing and assembly, interior research and development, offices and administration, interior product testing, and loading and unloading. There are two exterior dumpsters located in this drainage area; these dumpsters are kept shut at all times except during material transfer. Rooftop vents are outfitted with filters to prevent the discharge of particulate to rooftops. Potential pollutants associated with industrial activities include oil and grease and solids from vehicles, and sand applied to paved surfaces during the winter months. No undue erosion was noted at the site.

Outfall 006 *(East of Hopmeadow Street, Outfall 005)*
Outfall 006 drains approximately 11.5 acres through an earthen ditch located to the east of the railroad tracks bisecting the eastern Facility. The receiving water body for this discharge is Hop Brook. Industrial activities occurring in this drainage area include interior primary manufacturing, interior material storage and handling, exterior covered storage of pallets, loading and unloading, and interior production (including shipping and receiving). There are two exterior dumpsters located in this drainage area; these dumpsters are kept shut at all times except during material transfer. Rooftop vents are outfitted with filters to prevent the discharge of particulate to rooftops. Potential pollutants associated with industrial activities include oil and grease and solids from vehicles and sand applied to paved surfaces during the winter months. No undue erosion was noted at the site.

Outfall 012 *(West of Hopmeadow Street, Outfall 001)*
Outfall 012 drains approximately 1.2 acres through a 12-inch concrete pipe located west of Hopmeadow Street. The eventual receiving water body for this discharge is Hop Brook. Industrial activities occurring

in this drainage area include interior material storage and handling and loading and unloading. There are no exterior dumpsters or roof vents located in this drainage area. Potential pollutants associated with industrial activities include oil and grease and solids from vehicles and sand applied to paved surfaces during the winter months. No undue erosion was noted at the site.

3.1.2 Site Map

Figure 2A and **Figure 2B** show drainage features and potential pollutant sources at the Facility. This figure includes the drainage area for each stormwater outfall, drainage area size and estimated runoff coefficient, receiving water bodies, location of exposed or stored materials, and location of industrial activities that have the potential to be exposed to stormwater and discharge into the stormwater drainage system. Areas with no obvious outdoor exposure are also covered under this SWPPP, even if these areas do not discharge to a designated outfall. **Figure 2A** and **Figure 2B** illustrate all items, as applicable, required in Section 4.3.2.3 of the IGP.

3.2 Inventory of Exposed Materials

3.2.1 Methods and Locations of Storage

The location of all dumpsters maintained by EBAD are presented on **Figure 2A** and **Figure 2B**. All other material storage is conducted within buildings and protected from stormwater exposure. Limited construction and testing materials, including wooden pallets and metal plates used in explosives testing, are stored outdoors.

3.2.2 Stormwater Control Measures and Best Management Practices

A number of housekeeping practices are used at the Site:

- Source reduction: Preventive maintenance, spill prevention, good housekeeping, employee training, and materials management practices
- Containment/Diversion: Segregation of significant materials activities, indoor storage, and use of covers/roofs over outdoor storage areas

Other Site-specific industrial best management practices (BMPs) include the use of stormwater conveyances, containment diking, drip pans, collection basins, sweeping, signs/labels, and safety/security procedures.

Stormwater discharged from piped drainage conveyances receives minimal structural treatment. Infiltrating catch basins are utilized throughout the Facility to minimize the generation of stormwater runoff; locations of these practices are indicated on **Figure 2**. Further, a subsurface detention array is in use to capture and infiltrate stormwater runoff generated to the east of Building 100. Other nonstructural measures to reduce pollutants in the stormwater include sweeping paved areas, good housekeeping practices, and materials management. On-site containment areas provide protection against an accidental discharge of hazardous materials to the environment.

3.3 Summary of Potential Pollutant Sources

3.3.1 Material Loading and Access Areas

Material loading/unloading areas are located throughout the Facility and identified on **Figure 2**. These areas typically consist of a loading dock, and materials are stored inside Facility buildings and under permanent cover. As of March 2026, the majority of all loading and access areas are covered, reducing the potential for stormwater pollution to occur. To ensure compliance with Section 4.2.2.4 of the IGP, all loading areas not covered as of the date of this SWPPP will be covered by October 1, 2026. Since pollutants in stormwater can result from vehicular traffic and loading and unloading activities, it is expected that those activities may contribute pollutants to the stormwater discharges. These potential pollutants include raw materials used in the manufacture of explosives devices and systems produced on-site.

3.3.2 Roof Areas

Most buildings have roof-mounted air intake devices for air circulation. Fume hoods equipped with carbon canister emission treatment units are installed in a number of chemical laboratory buildings on-site. Hot air from chiller units is vented to the outside from a number of Facility roof vents. The small quantity of condensate from chiller units that occurs during cold weather may, at times, enter the storm drainage system. Flow contribution to the storm system from these sources is insignificant (not measurable).

3.3.3 Outdoor Storage Activities

Trash generated on-site, including recyclable cardboard, is stored in covered dumpsters in the locations shown on **Figure 2**. All dumpsters have been fitted with covers and drain plugs to minimize contact with stormwater. No raw materials or chemicals are stored uncovered outside.

3.3.4 Outdoor Manufacturing or Processing Activities

No manufacturing activities take place outdoors. Some product testing of explosive devices/systems occurs outdoors, at Building 106, the location of which is shown on **Figure 2A**. Stormwater runoff from this area does not drain to any outfall; and instead forms as sheet flow and is allowed to infiltrate into the surrounding grassed land.

3.3.5 Dust- or Particle-Generating Processes

The manufacturing processes that occur at the Site do not generate significant dust or particles. See **Section 3.3.2**. All rooftop vents that may emit dust or particles are outfitted with filters to prevent emission to rooftops. Some dust is generated during normal vehicle travel along gravel roadways and from normal construction activities on-site.

3.3.6 On-Site Waste Management Practices

All explosive wastes, pyrotechnic wastes (including waste materials contaminated with explosives or pyrotechnics), other hazardous wastes (liquid or solid), and nonhazardous wastes are collected from inside the plant in closed containers regularly from designated accumulation areas. These containers are transported by truck to centralized accumulation areas, where the wastes may await further on-site treatment, or are prepared for transportation to an off-site treatment and/or disposal facility.

3.4 Non-Stormwater Discharges

3.4.1 Allowable Non-Stormwater Discharges

The allowable non-stormwater discharges are as follows:

- Discharges from emergency/unplanned firefighting activities
- Landscape irrigation or lawn watering
- Uncontaminated condensate from air conditioners, coolers/chillers, and other compressors, and from the outside storage of refrigerated gases or liquids
- Uncontaminated groundwater or spring water
- Uncontaminated groundwater from foundation or footing drains
- Water sprayed for dust control, in accordance with the conditions of the IGP

3.4.2 Non-Stormwater Discharge Evaluation

Date of the Evaluation: March 30, 2026

Outfalls or Drainage Points That Were Observed During the Evaluation: All

Evaluation Conducted By: Craig Drennan, PE, CFM

Method of Evaluation: Visual inspection of all identified discharge points during dry weather conditions, and preceded by more than 72 hours of dry weather. No snowbanks were observed on-site at the time of inspection.

Findings of Evaluation:

All discharge points were observed to be dry. No unauthorized non-stormwater discharge was observed.

A certification of stormwater and non-stormwater discharges is presented in the beginning of this SWPPP.

3.5 Leaks or Spills of Significant Materials in the Past Three Years

Section 4.3.2.4.b of the IGP requires a list of spills and leaks of 5 gallons or more of petroleum products, or toxic or hazardous substances that could affect stormwater—as listed in Section 22a-430-4 (Appendix B, Tables II, III, and V; and Appendix D) of the Regulations of Connecticut State Agencies and 40 CFR 116.4—that occurred at the Facility after the date of 3 years prior to the date of certification of

the SWPPP, be included in the SWPPP. Records of leaks and spills of significant materials occurring for the current year and 3 previous years are provided in **Appendix C** to this SWPPP.

4 Monitoring Program

4.1 Representative Outfalls Monitored

As shown in the Site plan, there are 6 point sources of stormwater discharge from industrial use areas of the Facility. Four of the industrial use outfalls (DSN002, DSN005B, DSN006A, and DSN012) are considered to be representative discharges associated with industrial activity located on this Site. Of these, two outfalls are considered to be representative of other Substantially Identical Discharge Points (SIDPs) in the quarterly assessment and semiannual monitoring requirements of the EBAD Stormwater Monitoring Program. **Table 3** provides justification for the use of the SIDP exemption in these instances.

Table 3 Description of SIDPs

Drainage Area	Size, Acres	Estimated Runoff Coefficient	Selected Representative Outfall	Description of Substantially Identical Activities
DA-002	1.6	0.5	Outfall 002	Interior material storage and handling, loading and unloading, vehicle parking, and interior testing and manufacturing processes
DA-003	0.9	0.75		
DA-004	1.6	0.65	Outfall 05B	Interior material storage and handling, interior manufacturing and assembly, interior research and development, offices and administration, interior product testing, loading and unloading
DA-005	3.2	0.65		

4.2 Quarterly Visual Assessments

Visual assessments shall be conducted on a quarterly basis, with monitoring quarters begin on January 1, April 1, July 1, and October 1 of each year for the entire permit term. The assessment shall be conducted by members of the Stormwater Pollution Prevention Team or qualified persons designated by the Team Leader. All outfalls shall be monitored, with SIDPs monitored on a rotating basis as documented in **Appendix D**. Each quarterly visual assessment must be conducted during a qualifying storm event that occurs at least 72 hours (3 days) from the previous discharge. Samples must be collected for visual assessment within the first 30 minutes of actual discharge from the storm event. If it is not possible to collect a sample within this timeframe, the sample must be collected as soon as feasible to do so after the first 30 minutes, and the reason for the delay must be documented on the monitoring form. In the case of snowmelt, samples must be taken during a period of measurable discharge and a qualifying storm event.

The visual assessment must be made of a sample in a clean, clear glass, or plastic container, and examined in a well-lit area. The visual inspection must be performed for the following water quality characteristics:

- Color
- Odor
- Clarity
- Floating solids
- Settled solids
- Suspended solids

- Foam
- Oil sheen
- Other obvious indicators of stormwater pollution

The Quarterly Visual Monitoring Form is included as **Appendix E** to this SWPPP. This form is completed for each outfall assessed during each quarterly event and retained for a period of at least 5 years with this SWPPP in **Appendix E**. If, based on the above indicators, the visual assessment indicates that the control measures for the Facility are inadequate or are not being properly operated and maintained, EBAD must review and revise the selection, design, installation, and implementation of the control measures to ensure that the condition is eliminated and will not be repeated in the future in accordance with the Corrective Action Procedures (CAPs) identified in Section 4.5.3.8 of the IGP.

4.3 Semiannual Benchmark Monitoring

The semiannual monitoring events shall be conducted between January 1 and June 30 and again between July 1 and December 31 of each year. The two semiannual monitoring events shall be separated by at least 30 days. The assessment shall be conducted by members of the Stormwater Pollution Prevention Team or qualified persons designated by the Team Leader. Outfalls DSN002, DSN05B, DSN006, and DSN012 will be monitored. The other stormwater discharges (see the Site drainage maps on **Figure 2**) will not be monitored, as they are considered SIDPs.

All samples shall be collected from discharges resulting from a storm event that occurs at least 72 hours after any previous storm event generating a stormwater discharge. The Stormwater Monitoring Report (SMR, included as **Appendix F**) must uniquely identify if any sample contains snow or ice melt.

If no discharge occurs during a monitoring period, an SMR form shall still be submitted with a notation of “no discharge.”

Grab samples shall be used for all monitoring and shall not be combined. Collection of grab samples shall begin during the first 30 minutes of a storm event discharge and shall be completed as soon as possible. Samples shall be taken at the outfall or nearest feasible location representative of the discharge. All discharge samples at a facility must be taken during the same storm event, if feasible.

In accordance with the IGP, stormwater grab samples will be analyzed for the parameters listed in **Table 4**. Within 90 days of the date of sampling, EBAD will submit a copy of the SMR for each sampled outfall to CTDEEP, Bureau of Water Management, and Water Toxics Program Coordinator. The report will include the complete results of the biomonitoring test, information regarding the reference toxicant results, results of chemical analyses performed on the stormwater, and Facility information. The results of stormwater sampling events, SMRs, shall be kept for a minimum of 5 years.

Table 4 Semiannual Benchmark Monitoring Parameters

Parameter	Benchmark	Units
Chemical Oxygen Demand	75	mg/L
Total Oil and Grease	5	mg/L
pH	5.0–9.0	S.U.

Parameter	Benchmark	Units
Total Suspended Solids	90	mg/L
Nitrate as Nitrogen	1.10	mg/L
Total Phosphorus	0.40	mg/L
Total Kjeldahl Nitrogen	2.30	mg/L
Total Copper	0.59	mg/L
Total Lead	0.076	mg/L
Total Zinc	0.160	mg/L
Total Aluminum	0.750	mg/L

In accordance with Section 4.7.2.1 of the IGP, SMRs will be submitted in paper format to CTDEEP until receipt of Notice of Coverage, which will contain instructions on how to transition to the federal online reporting system, NetDMR.

If the average of four consecutive measurements for a given parameter does not exceed the benchmark threshold at a given outfall, a temporary monitoring exemption is awarded per Section 4.5.1.5 of the IGP. EBAD will discontinue monitoring of said parameter at said outfall for a maximum of 2 years.

4.4 Aquatic Toxicity Monitoring

The assessment shall be conducted once, in the year following the date of authorization under the 2025 IGP, by members of the Stormwater Pollution Prevention Team or qualified persons designated by the Team Leader.

Sampling shall be done at the same time as one of two semiannual sampling events during the first year after permit authorization.

Outfalls DSN002, DSN005B, DSN006, and DSN012 will be monitored. The following parameter shall be assessed:

Table 5 Parameter Assessed for Annual Aquatic Toxicity Monitoring

Parameter	Benchmark
Aquatic Toxicity	LC_{50} > 50%

Note:
LC_{50} = median lethal concentration

Grab samples shall be used and shall not be combined. Collection of grab samples shall begin during the first 30 minutes of a storm event discharge and shall be completed as soon as possible. Each sample shall be representative of the stormwater discharge at the locations where it is collected. Each sample shall be collected in a laboratory-supplied container. All samples shall be collected from discharges resulting from a storm event that occurs at least 72 hours after any previous storm event generating a stormwater discharge.

If feasible, all samples are to be collected during the same storm event. The following information shall be collected for the storm events monitored:

- The date, discharge temperature, time of the start of the discharge, time of sampling, and magnitude (in inches) of the storm event sampled
- The pH of the uncontaminated rainfall (before it contacts the ground)
- The duration between the storm event sampled and the end of the most recent storm event that produced a discharge

The analysis shall be conducted according to the procedures prescribed in the United States Environmental Protection Agency's (USEPA's) *Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms*,[1] and in accordance with the specific conditions noted in Section 4.5.4 of the IGP.

4.5 Annual Effluent Limit and Impaired Waters Monitoring

Facilities that discharge industrial stormwater to designated impaired waters must conduct additional monitoring. An impaired waterbody is one that has been assessed by the CTDEEP as not meeting Connecticut's Water Quality Standards for a given designated use (e.g., fish and wildlife habitat, recreation, agricultural and industrial supply, etc.). As described in **Section 3** of this SWPPP, no outfalls from the DNI Facility discharge to any impaired waters, and as such, no additional monitoring is required.

[1] United States Environmental Protection Agency. (2002, October). *Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms* (5th ed.). EPA 821-R-02-012. https://www.epa.gov/sites/default/files/2015-08/documents/acute-freshwater-and-marine-wet-manual_2002.pdf

5 Measures and Controls

5.1 Loading and Unloading

Material loading/unloading areas are located throughout the Facility and identified in the Site plans on **Figure 2**. These areas typically consist of a loading dock, and materials are stored inside Facility buildings and under permanent cover. As of March 2026, the majority of all loading and access areas are covered, reducing the potential for stormwater pollution to occur. To ensure compliance with Section 4.2.2.4 of the IGP, all loading areas not covered as of the date if this SWPPP will be covered by October 1, 2026. All standard catch basins in the vicinity of loading docks are maintained in a manner that prevents any materials spilled or released at the loading dock from entering the storm drainage system, through the use of deployable drain cover mats.

5.2 Good Housekeeping

Good housekeeping practices are employed at the Site to provide a clean and orderly work environment. This contributes to a reduction in stormwater pollution from activities at the Site and the possibility of an accidental spill of chemicals. Good housekeeping practices employed by EBAD include the following:

- Neat and orderly storage and labeling of chemicals and wastes
- Prompt removal and remediation of any spills
- Maintenance of clean and dry floors
- Maintenance of proper pathways and walkways and proper storage of containers, and drums such that they do not protrude into pathways

No washwaters containing any additives or chemicals will be discharged to the ground, storm sewer system, or any surface waters of the State.

5.3 Dumpster Maintenance and Control

All dumpsters maintained by EBAD at the Facility are maintained in good, sound, watertight condition and with covers and drain plugs intact to prevent exposure of collected wastes to rainfall. Covers remain closed at all times except when the dumpster is being actively loaded or unloaded.

5.4 Vehicle or Equipment Washing

No washing of equipment or vehicles is allowed at the Facility.

5.5 Sediment and Erosion Control

The unpaved roadways on-site are covered with crushed stone to minimize the entrainment of sediments into stormwater runoff. The condition of the stone cover will be inspected and maintained as needed. Other than normal lawn maintenance, no major sediment and erosion control measures are required at the Facility. Appropriate measures (e.g., hay bale or silt fencing) will be used as needed in areas that are disturbed during any future construction. Any new construction will be conducted in accordance with applicable local and state erosion and sediment control permits and regulations.

5.6 Preventive Maintenance and Inspections

Preventive maintenance involves routine equipment maintenance and visual inspection of areas that could generate spills, leaks, etc. Routine Sitewide inspections are conducted on a monthly basis, as described in **Section 6**. As maintenance and CAP items are identified through routine inspections or regularly scheduled visual assessments and benchmark monitoring, maintenance will be scheduled as needed to address any problems identified. Further, annual Sitewide catch basin cleaning is implemented for all storm drains at the Site.

In addition, the subsurface infiltration system is installed at Building 100. This practice is inspected and maintained in accordance with manufacturer specifications.

Maintenance records are maintained in the EBAD environmental, health, and safety (EH&S) office.

5.7 Spill Prevention and Response Procedures

Procedures for emergency response and cleaning up of spills are described in the Emergency Action Plan for DNI, EBAD, and Ensign-Bickford Industries, maintained under separate cover.

5.8 Employee Training

All employees involved with activities resulting in contact with stormwater will obtain proper training in spill prevention and response procedures, good housekeeping, and material management practices. This training will cover proper spill prevention procedures, housekeeping practices, and the components of this SWPPP. Training will be provided, at a minimum, on an annual basis to the members of the Stormwater Pollution Prevention Team. Annual training records are kept in **Appendix B** to this SWPPP. Training materials shall be reviewed and updated as necessary with every revision made to this SWPPP.

5.9 Additional Requirements for Salt Storage

Sand is used for winter road maintenance. No de-icing materials are stored outdoors or in a manner otherwise exposed to stormwater.

5.10 Resiliency

The Simsbury Facility immediately abuts two major waterbodies and is located within the 100-year floodplain of both. As the property owner, DNI maintains and implements a flood response procedure to prevent damage to Facility infrastructure and release of materials during flood events. The reader is directed to DNI's flood response procedure for additional information.

6 Inspections and Reporting

6.1 Comprehensive Monthly Inspections

Section 4.4 of the IGP requires both routine (monthly) inspections and semiannual comprehensive inspections to ensure compliance with the SWPPP and other materials management procedures. To simplify compliance schedules and ensure continuous compliance, EBAD implements monthly inspections that meet the rigor of comprehensive, semiannual inspections. The details of these comprehensive monthly inspections are provided below.

Person(s) Responsible
The inspections will be performed by persons who are familiar with Facility operations, the Stormwater IGP, this SWPPP, and BMPs, including at least one Stormwater Pollution Prevention Team member.

Schedule
Inspections shall be conducted during rainfall events, if possible. At least one inspection per year shall be conducted during a rain event.

Documents to Be Reviewed Prior to Inspection
The following documents shall be reviewed prior to inspection:

- The current SWPPP
- The current Site map
- All routine inspection reports for the year
- All visual monitoring reports for the year
- All analytical stormwater monitoring for the year
- Spill reports
- Recent CTDEEP correspondence (as applicable)
- Other documentation identified by the Stormwater Pollution Prevention Team Coordinator

Inspection Procedures
Comprehensive monthly inspections will be conducted in accordance with the Inspection Report Form provided in **Appendix G**. Specific items to be covered by the inspection include the following:

- Drainage areas
- Buildings, structures, permanent cover, and impervious area
- Stormwater control measures (infiltration systems)
- Consistent use of good housekeeping and other non-structural control measures
- Materials handling and control measures
- Dumpster and maintenance control
- Loading dock protection
- Roof area protection
- Stormwater conveyances (channels, gutters, piping, etc.)
- Stormwater discharge points
- Areas where industrial material or activities are exposed to stormwater
- Vehicle maintenance and storage areas
- Materials handling areas

Inspection reports prepared following comprehensive monthly inspections must be signed by the Stormwater Pollution Prevention Team Coordinator and retained as part of the SWPPP for at least 5 years after the date of the inspection.

6.2 Annual Reporting

As required by Section 4.7.3 of the IGP, EBAD shall prepare and submit an Annual Report (AR) by April 15 of each year to the Commissioner. ARs shall be submitted electronically to deep.stormwater.industrial@ct.gov.

The AR will be prepared using the form included in **Appendix H** and shall include:

1. Summary of previous year's monitoring data (as applicable)
2. Summary of previous year's Site inspections
3. Summary of previous year's visual assessments
4. Summary of recent or ongoing corrective actions (as applicable)
5. Summary of recent noncompliance (as applicable)
6. Certification

7 Plan Amendment

The SWPPP shall be amended whenever:

1. There is a change at the Site that has an effect on the potential to cause pollution of the surface waters of the State;
2. The actions required by the SWPPP fail to ensure or adequately protect against pollution of the waters of the State;
3. CTDEEP requests modification of the SWPPP;
4. EBAD is notified that the receiving water has been designated as impaired under Section 303(d) of the Clean Water Act and as identified in the most recent State of Connecticut Integrated Water Quality Report.
5. EBAD is notified that a TMDL to which the Facility is subject has been established for the stormwater receiving water;
6. Amendment is necessary to address any significant sources or potential sources of pollution identified as a result of any inspection or visual monitoring; or
7. It is required as a result of monitoring benchmarks or effluent limitations in “Monitoring” (Section 5[e]) or “Additional Requirements for Certain Sectors” (Section 5[f]).

The amended SWPPP will be completed, and all actions required by the SWPPP will be completed within 120 days of the date EBAD becomes aware that any of the above conditions have occurred.

The Commissioner may notify EBAD at any time that the SWPPP does not meet one or more of the requirements of the IGP. Unless otherwise advised by the Commissioner in writing, within 120 days of such notification from the Commissioner, EBAD will revise the SWPPP, perform all actions required by the revised SWPPP, and submit to the Commissioner in writing that the requested changes have been made and implemented, and such other information as the Commissioner requires.

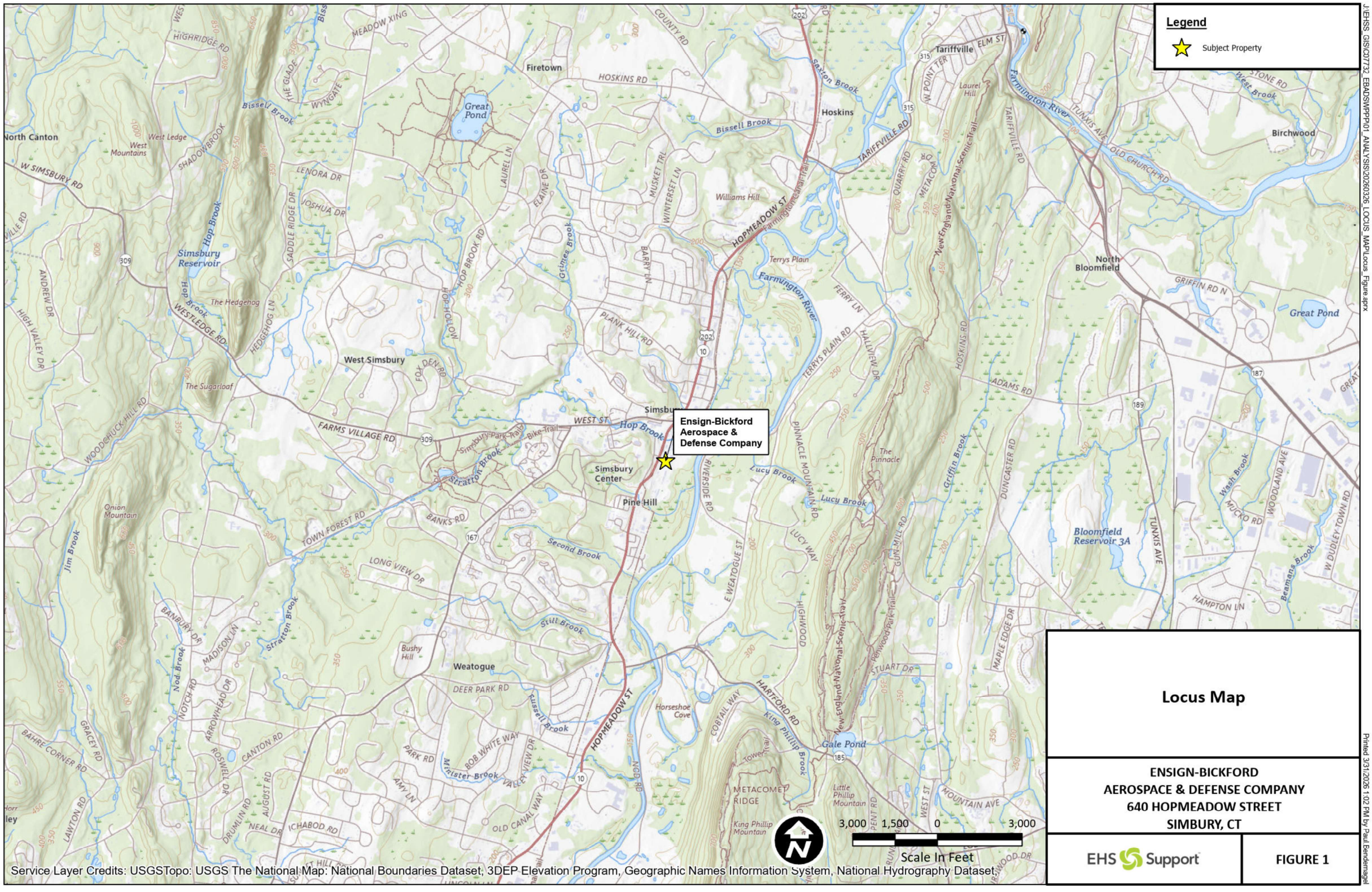
8 Recordkeeping

The following documentation shall be retained for a minimum of 5 years following the IGP expiration date:

- Copies of the IGP registration form, any letters received from the permitting authority, and a copy of the IGP
- Dates of any incidences of significant spills, leaks, or other releases that resulted in a discharge of pollutants, the circumstances leading to the release, actions taken in response to the release, and measures taken to prevent the recurrence of a release
- Copies of all employee training records, including dates, which employees were trained, and the training topics
- Copies of all maintenance and repairs of control measures, including dates of regular maintenance, dates when maintenance needs were discovered, and dates when control measures were returned to full function
- Copies of all comprehensive monthly Facility inspection reports and quarterly visual assessment reports
- Records of all sampling results including data collection forms, lab results, and monitoring reports
- Records of all corrective actions and follow-up activities conducted to demonstrate compliance with the IGP
- Records of calibration and maintenance of instrumentation used for measurements or monitoring pursuant to the IGP

The documentation shall be on-site, accessible, complete, and up-to-date so that they demonstrate the Facility's full compliance with the IGP conditions.

Figures



Reviewed By: C. Drennan

Locus Map

ENSIGN-BICKFORD
AEROSPACE & DEFENSE COMPANY
640 HOPMEADOW STREET
SIMSBURY, CT

EHS Support | **FIGURE 1**

J:\EHSS_GIS\CI\7732_EBADSWPP\01 ANALYSIS\20260326_LOCUS_MAP\Locus_Figure.aprx

Printed: 3/31/2026 1:02 PM by Paul Bendernagel

HOPMEADOW STREET (CT ROUTE 202)

WOODLAND STREET

DA-004
AREA: 68,410 SF
IMPERVIOUS AREA: 37,660 SF
EST. RUNOFF COEFF.: 0.65

DA-006
AREA: 503,758 SF
IMPERVIOUS AREA: 239,007 SF
EST. RUNOFF COEFF.: 0.55

OUTFALL 004
6" PVC PIPE
LAT. 41.86833
LONG. -72.8055

OUTFALL 002
CONCRETE DITCH
LAT. 41.86942
LONG. -72.80381

DA-002
AREA: 69,280 SF
IMPERVIOUS AREA: 26,550 SF
EST. RUNOFF COEFF.: 0.50

DA-003
AREA: 39,570 SF
IMPERVIOUS AREA: 29,180 SF
EST. RUNOFF COEFF.: 0.75

DA-005
AREA: 137,600 SF
IMPERVIOUS AREA: 81,860 SF
EST. RUNOFF COEFF.: 0.65

OUTFALL 005C
4" PVC PIPE

OUTFALL 003
10" CERAMIC PIPE
LAT. 41.86850
LONG. -72.80349

OUTFALL 005
10" CERAMIC PIPE
LAT. 41.86827
LONG. -72.80381

OUTFALL 005B
6" PVC PIPE

OUTFALL 005A
ASPHALT DITCH

OUTFALL 006A
LAT. 41.52414
LONG. -72.48110

HOP BROOK DRAINS TO
THE FARMINGTON RIVER
(WATERSHED I.D. 4318-00)

HOP BROOK

UNT TO
FARMINGTON RIVER

FARMINGTON RIVER

LEGEND

- PROPERTY LINE
- FENCELINE
- 2' TOPOGRAPHIC CONTOURS 2023 CT LiDAR
- STORMWATER CONDUIT
- DRAINAGE DITCH
- APPROX. DRAINAGE AREA
- IMPERVIOUS COVER EXTENT
- GRAVEL ROADWAYS
- OVERHANG
- BUILDINGS (DNI)
- BUILDINGS (EBAD)
- HOP BROOK — WATERBODIES
- CATCH BASIN / INLET (DRAINS TO OUTFALL)
- DRY WELL / FRENCH DRAIN (INFILTRATING)
- COVERED DUMPSTER / ROLL-OFF CONTAINER (DNI-OWNED)
- COVERED DUMPSTER / ROLL-OFF CONTAINER (EBAD-OWNED)
- ROOF VENTS/ EXHAUST
- EBAD LOADING DOCK
- OUTFALL 007 18" RCP LAT. 41.86477 LONG. -72.80545 — IGP STORMWATER OUTFALL (SAMPLED)
- OUTFALL 005C 6" CERAMIC PIPE — IGP STORMWATER OUTFALL (NOT SAMPLED)

EHS Support

0 200 400 Feet

STORMWATER POLLUTION PREVENTION PLAN
ENSIGN-BICKFORD AEROSPACE & DEFENSE COMPANY
SIMSBURY, CONNECTICUT

EAST OF HOPMEADOW STREET
STORMWATER DRAINAGE FEATURES

LLC.07732.0000	DATE: MARCH 2026	DRAWN BY: CMD	FIGURE 2A

File: C:\Users\Alexis.Suarez\EHS Support LLC\Ensign-Bickford Aerospace & Defense Company - Documents\Technical\2400\20 SWPPP\2026.03.25_SWPPP.dwg Layout: Fig2A User: Alexis.Suarez Plotted: Mar 31, 2026 - 11:08am

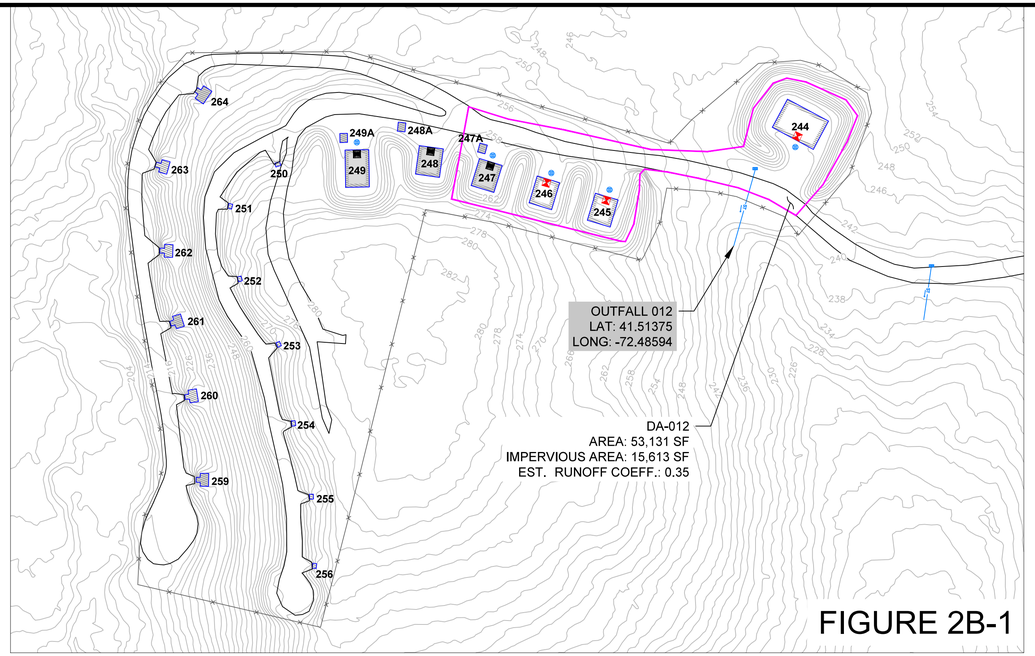


FIGURE 2B-1

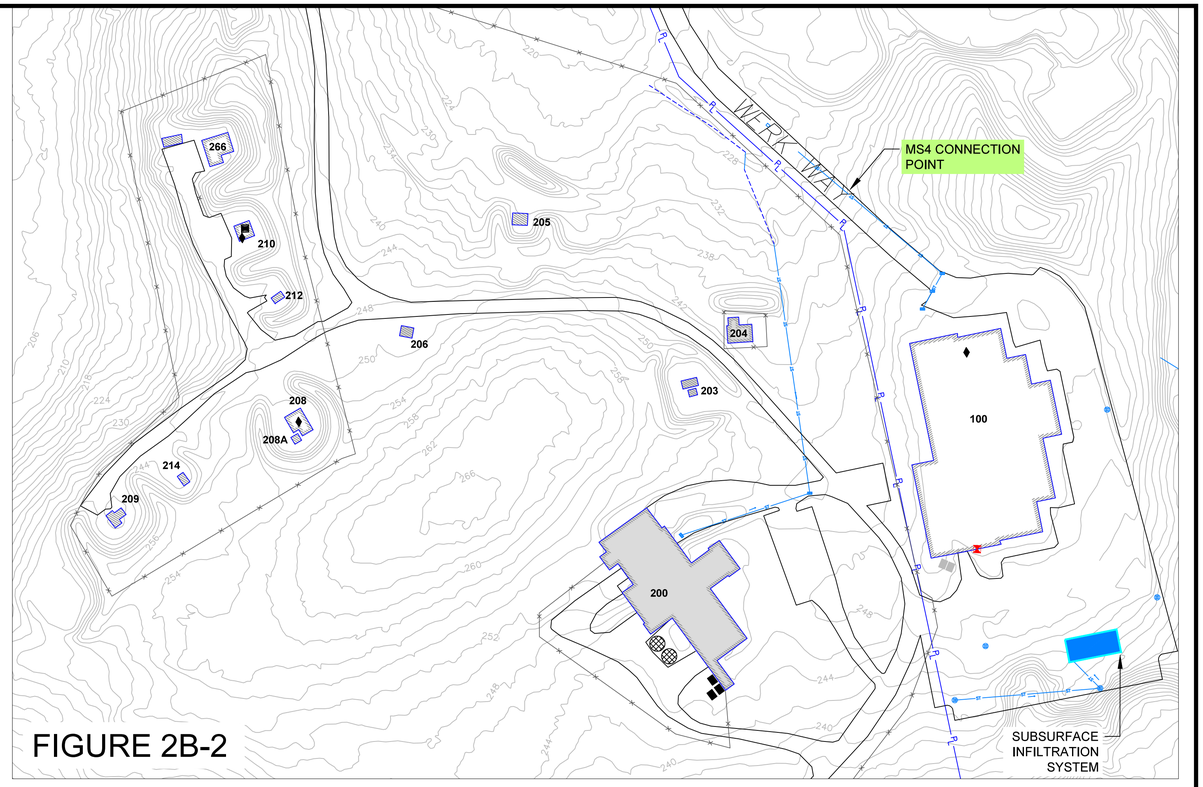


FIGURE 2B-2

LOCUS MAP

0 100 200 Feet

0 100 200 Feet

LEGEND

- PROPERTY LINE
- FENCELINE
- 2' TOPOGRAPHIC CONTOURS 2023 CT LiDAR
- STORMWATER CONDUIT
- DRAINAGE DITCH
- APPROX. DRAINAGE AREA
- IMPERVIOUS COVER EXTENT
- GRAVEL ROADWAYS
- OVERHANG
- BUILDINGS (DNI)
- BUILDINGS (EBAD)
- HOP BROOK — WATERBODIES
- CATCH BASIN / INLET (DRAINS TO OUTFALL)
- DRY WELL / FRENCH DRAIN (INFILTRATING)
- COVERED DUMPSTER / ROLL-OFF CONTAINER (DNI-OWNED)
- COVERED DUMPSTER / ROLL-OFF CONTAINER (EBAD-OWNED)
- LOADING DOCK
- ROOF VENTS/ EXHAUST

OUTFALL 007
18" RCP
LAT. 41.86477
LONG. -72.80545
— IGP STORMWATER OUTFALL (SAMPLED)

OUTFALL 005C
6" CERAMIC PIPE
— IGP STORMWATER OUTFALL (NOT SAMPLED)

EHS Support

STORMWATER POLLUTION PREVENTION PLAN ENSIGN-BICKFORD AEROSPACE & DEFENSE COMPANY SIMSBURY, CONNECTICUT		WEST OF HOPMEADOW STREET STORMWATER DRAINAGE FEATURES	
LLC.07732.0000	DATE: MARCH 2026	DRAWN BY: CMD	FIGURE 2B

Appendix A IGP Registration

Appendix B Annual Training Logs

Date	Name	Role

Appendix C Significant Leaks or Spills

Log of Significant Spills and Leaks (>5 gallons)

Date (MM/DD/YY) and Time	Location	Description				Response Procedures	Corrective Measures Taken
		Type of Material	Quantity	Source	Reason		

Appendix D Quarterly Visual Assessment Compliance Schedule

Quarter	Outfall to be Assessed					
	OF002	OF003	OF004	OF05B	OF06A	OF012
Q1 2026	X		X		X	X
Q2 2026		X		X	X	X
Q3 2026	X		X		X	X
Q4 2026		X		X	X	X
Q1 2027	X		X		X	X
Q2 2027		X		X	X	X
Q3 2027	X		X		X	X
Q4 2027		X		X	X	X
Q1 2028	X		X		X	X
Q2 2028		X		X	X	X
Q3 2028	X		X		X	X
Q4 2028		X		X	X	X
Q1 2029	X		X		X	X
Q2 2029		X		X	X	X
Q3 2029	X		X		X	X
Q4 2029		X		X	X	X
Q1 2030	X		X		X	X
Q2 2030		X		X	X	X
Q3 2030	X		X		X	X
Q4 2030		X		X	X	X

Appendix E Quarterly Visual Monitoring Form

Instructions:

- Samples can only be collected during storm events that occur at least 72 hours after any previous storm events generating flow at the sampling location.
- Samples must be collected within first 30 minutes of flow at the sampling location.
- Visual assessments must be made in a clean, clear glass, or plastic container, and examined in a well-lit area.
- If objectionable characteristics are observed, the cause of contamination must be investigated and corrected. Document the investigation and remedial actions on a Remedial Action Log.
- File completed Quarterly Visual Monitoring Forms and Remedial Action Logs in **Appendix E** of the SWPPP.

Sampling Date: _____ Sampling Time (a.m./p.m.): _____

Sampling Location: _____

Sampler's Name & Title: _____

Previous Storm Event Date & Time: _____

Contains Ice or Snow Melt(yes or no): _____

Stormwater pH: _____

Water Quality Characteristics	Observations
Color	
Odor	
Clarity	
Floating Solids	
Settled Solids	
Suspended Solids	
Foam	
Oil sheen	
Other obvious indicators of stormwater pollution	

Quarterly Visual Monitoring Form

Instructions:
If objectionable characteristics are observed, the probable sources of the contamination must be investigated, corrected, and documented using this log. File completed evaluation remedial action logs in **Appendix F** of the SWPPP following the corresponding quarterly visual monitoring form.

Sampling Date	Objectionable Water Quality Characteristics Observed	Probable Sources of Stormwater Contamination	Completed Remedial Actions		
			Description	Completion Date	Completed By

Appendix F Stormwater Monitoring Report Form

Connecticut Department of
Energy & Environmental Protection
Bureau of Materials Management & Compliance Assurance
Water Permitting & Enforcement Division

General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities, issued 8/21/13, effective 10/1/13
Stormwater Monitoring Report

SITE INFORMATION

Permittee: _____

Mailing Address: _____

Business Phone: _____ ext.: _____ Fax: _____

Contact Person: _____ Title: _____

Site Name: _____

Site Address: _____

Receiving Water (name, basin): _____

Stormwater Permit No. GSN _____

SAMPLING INFORMATION (Submit a separate form for each outfall)

Outfall Designation: _____ Date/Time Collected: _____

Outfall Location(s) (lat/lon or map link): _____

Person Collecting Sample: _____

Storm Magnitude (inches): _____ Storm Duration (hours): _____

Size of Disturbed Area at any time: _____

MONITORING RESULTS

Sample #	Parameter	Method	Results (units)	Laboratory (if applicable)
1	Turbidity			
2	Turbidity			
3	Turbidity			
4	Turbidity			

(provide an attachment if more than 4 samples were taken for this outfall) Avg =

STATEMENT OF ACKNOWLEDGMENT

I certify that the data reported on this document were prepared under my direction or supervision in accordance with the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities. The information submitted is, to the best of my knowledge and belief, true, accurate and complete.

Authorized Official: _____

Signature: _____ Date: _____

Please send completed form to:

DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION
BUREAU OF MATERIALS MANAGEMENT AND COMPLIANCE ASSURANCE
79 ELM STREET
HARTFORD, CT 06106-5127
ATTN: NEAL WILLIAMS

Appendix G Comprehensive Monthly Stormwater Inspection Report Form

Comprehensive (Monthly)
Industrial Stormwater Inspection
Ensign-Bickford Aerospace & Defense Company

Date: Drainage Area:

Weather Conditions: Sunny ☐ Cloudy ☐
Rain ☐ Snow/Ice ☐

Control Measure/Feature	Location (Building #)	Condition (Check one)		Observation	Corrective Measure * (Date Implemented)
		Acceptable	Unacceptable		
Dumpsters or					
Roll-Off Containers					
Loading/Unloading Areas					
Catch Basins					
Outside Equipment Storage or Maintenance					
Spill Kits Present					
Erosion/Construction Activities					
Non-Stormwater Discharges					
Outfall Description(s) and Condition					
Spills/Staining					

*Tracking or follow-up procedures shall be used to ensure that appropriate actions are taken in response to inspections.

Inspector Name _____

Signature _____

Appendix H Annual Reporting Form

EHS Support

CTDEEP Industrial Stormwater General Permit – Annual Reporting Form

Ensign-Bickford Aerospace & Defense Company – Simsbury Facility

Registration No. _____

Instructions: Annual Report must be completed for the prior calendar year, and be submitted to CTDEEP by April 15. Annual reports shall be submitted electronically to DEEP.Stormwater.Industrial@ct.gov.

Annual Report for Calendar Year: _____

Part A: Summary of Monitoring Data

Summarize the outfall monitoring data collected at each outfall over the prior calendar year. If the Facility was exempted from sampling certain parameters at certain outfalls during a given period due to consecutive samples registering below the benchmark value, as described in Section 4.5.1.5 of the Permit, write "NS" in place of laboratory analytical results in the tables below.

Period 1: January 1 – June 30: Sample collected on ___/___/___

Parameter	Benchmark	Results by Outfall					
		001	005B	006	008	009	011
Chemical Oxygen Demand	75 mg/L						
Total Oil & Grease	5 mg/L						
pH	5.0 – 9.0 SU						
Total Suspended Solids	90 mg/L						
Nitrate as Nitrogen	1.10 mg/L						
Total Phosphorus	0.40 mg/L						
Total Kjeldahl Nitrogen	2.30 mg/L						
Total Copper	0.059 mg/L						
Total Lead	0.076 mg/L						
Total Zinc	0.160 mg/L						
Total Aluminum	0.750 mg/L						

Period 2: July 1 – December 31: Sample collected on ___/___/___

Parameter	Benchmark	Results by Outfall					
		001	005B	006	008	009	011
Chemical Oxygen Demand	75 mg/L						
Total Oil & Grease	5 mg/L						
pH	5.0 – 9.0 SU						
Total Suspended Solids	90 mg/L						
Nitrate as Nitrogen	1.10 mg/L						
Total Phosphorus	0.40 mg/L						
Total Kjeldahl Nitrogen	2.30 mg/L						
Total Copper	0.059 mg/L						
Total Lead	0.076 mg/L						
Total Zinc	0.160 mg/L						
Total Aluminum	0.750 mg/L						

Aquatic Toxicity Testing: Required for 2026. Sample collected on ___/___/___

Parameter	Benchmark	Results by Outfall					
		001	005B	006	008	009	011
Daphnia Pulex	Report LC50						

EHS Support

Part B: Summary of Site Inspections

1. Document all site inspections conducted during the reporting period.

Inspection No.	Date	Inspector Name	Inspector Title	Stormwater Discharge During Inspection?

EHS Support

2. For each inspection answer the following questions concerning inspection results (answer “Y” or “N”).

Inspection No.	Were raw materials, products or wastes observed that may have or could come into contact with stormwater?	Were leaks or spills from equipment, drums, tanks, or other containers observed?	Was off-site tracking of industrial or waste materials or sediment where vehicles enter or exit the site observed?	Was tracking or blowing of raw, final, or waste materials from exposed areas to areas of no exposure observed?	Were control measures or BMPs needing replacement, maintenance or repair observed?	Was the presence of authorized non-stormwater discharges not identified in the SWPPP or unauthorized non-stormwater discharges observed?

Part C: Summary of Visual Assessments

Summarize all visual assessments of stormwater discharge conducted over the past year. For each assessment, summarize all observations of water quality (color, odor, clarity, floating solids, settled solids, suspended solids, foam sheen, or other indicators of pollution).

Period 1: January 1 – March 31: Assessment conducted on ___/___/___

Outfall Assessed	Summary of Observations

Period 2: April 1 – June 30: Assessment conducted on ___/___/___

Outfall Assessed	Summary of Observations

Period 3: July 1 – September 30: Assessment conducted on ___/___/___

Outfall Assessed	Summary of Observations

Period 4: October 1– December 31: Assessment conducted on ___/___/___

Outfall Assessed	Summary of Observations

Part D: Summary of Corrective Actions

Summarize all corrective actions taken over the past year, alongside any benchmark exceedance documentation. If corrective actions have not yet been completed at the time of submittal of this report, describe the status of said corrective actions and associated timeline for completion.

Part E: Summary of Noncompliance

Summarize all instances of noncompliance with the IGP over the previous year or currently ongoing. If none, provide a statement that the Facility is in compliance with the permit.

Part F: 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 the submitted information may be punishable as a criminal offense, in accordance with section 22a-6 of the Regs. Conn. State Agencies, pursuant to section 53a-157b of the Regs. Conn. State Agencies, and in accordance with any other applicable statute.

Certifier Name: _____

Certifier Title: _____

Certifier Signature: _____

Date: ___/___/___

IGP Registration Number:

Ensign-Bickford Aerospace & Defense Company- Simsbury Facility
640 Hopmeadow Street, Simsbury, CT