

**State of Connecticut, Department of Public Health
Drinking Water Section, Drinking Water State Revolving Fund (DWSRF)
ENVIRONMENTAL ASSESSMENT SUMMARY**

Date:	July 3, 2018	Staff Contact:	Eric McPhee
Applicant PWS Name:	Town of East Lyme	Town:	East Lyme
PWSID:	CT0450011		
Project Name:	Well 1A Raw Water Main and Well 6 Treatment Plant Improvements		
Funding Source:	Drinking Water State Revolving Fund (DWSRF)		
State Funds:	\$ 6,000,000.00		

This assessment is being conducted in conformance to the generic Environmental Classification Document for Connecticut state agencies to determine Connecticut Environmental Policy Act (CEPA) obligations

Project Description: The Town of East Lyme is seeking financial assistance under the Drinking Water State Revolving Fund (DWSRF) program for the proposed improvements to its existing greensand filtration system located at the Well 6 Water Treatment Plant (WTP) and a raw water main from Well 1A to the improved Well 6 WTP. The water from Well 1A contains elevated levels of iron and manganese. Approximately 1,400 lineal feet of new 12-inch diameter ductile iron main will be installed to convey the raw water from Well 1A to the Well 6 WTP where it can be treated for iron and manganese removal. The Well 6 WTP is being improved to accommodate the additional flow from Well 1A. The project will also include a building addition next to the existing WTP to accommodate new treatment equipment and additional chemical storage, emergency generator installation, and associated components.

Regulations of Connecticut State Agencies (RCSA) Section 22a-1a-3 Determination of environmental significance (direct/indirect)

1. Impact on air and water quality or on ambient noise levels
 - a. Air Quality – Section 22a-174-18(b)(3)(C) of the RCSA limits the idling of mobile sources to 3 minutes. This regulation applies to most vehicles such as trucks and other diesel engine-powered vehicles commonly used on construction sites. It should be noted that only the Department of Energy and Environmental Protection (DEEP) can enforce Section 22a-174-18(b)(3)(C) of the RCSA. Therefore, it is recommended that the project sponsor include language similar to the anti-idling regulations in the contract specifications for construction in order to allow them to enforce idling restrictions at the project site without the involvement of DEEP.

DEEP typically recommends the use of newer off-road construction equipment that meets the latest EPA or California Air Resources Board (CARB) standards. If that newer equipment cannot be used, equipment with the best available controls on diesel emissions including retrofitting with diesel oxidation catalysts or particulate filters in addition to the use of ultra-low sulfur fuel would be the second choice that can be effective in reducing exhaust emissions. The use of newer equipment that meets EPA standards would obviate the need for retrofits.

DEEP also recommends the use of newer on-road vehicles that meet either the latest EPA or CARB standards for construction projects. These on-road vehicles include dump trucks, fuel

delivery trucks and other vehicles typically found at construction sites. On-road vehicles older than the 2007-model year typically should be retrofitted with diesel oxidation catalysts or diesel particulate filters for projects. The use of newer vehicles that meet EPA standards would eliminate the need for retrofits.

- b. Water Quality – The Town of East Lyme will be required to modify the information in their registration under the Miscellaneous General Permit for the increase in the daily water treatment wastewater discharge that will likely result from this project. Information regarding permit modification is in section 4(e) of the [Miscellaneous General Permit](#).

Hydrostatic pressure testing wastewater discharges resulting from this project are authorized as “potable water system maintenance wastewaters” under the [Comprehensive General Permit](#) for Surface Water and Groundwater (Comprehensive General Permit). No registration is required under the Comprehensive General Permit for this discharge but East Lyme must comply with operating conditions and effluent limits of the Comprehensive General Permit.

Questions can be directed to Don Gonyea, 860-424-3827, Donald.gonyea@ct.gov; or Jim Creighton, 860-424-3681, james.creighton@ct.gov .

- c. Ambient Noise Levels - The proposed project is not expected to cause significant noise in the immediate area;

2. Impact on a public water supply or serious effects on groundwater, flooding, erosion, or sedimentation

- a. Water Supply – The proposed project is within the Town of East Lyme’s Gorton’s Pond Level A Aquifer Protection Area. Since the project will be constructed on land owned by the Town of East Lyme, the Town will be required to apply for and receive a Water Company Land Change in Use permit pursuant to Connecticut General Statutes Section 25-32(b). The Town should include the DEEP’s best management practices for work in an Aquifer Protection Area in the Water Company Land Permit Application.
- b. Groundwater - The proposed project is not expected to cause significant impacts to neighboring groundwater.
- c. Flooding –The proposed project is not located within the 100-year flood zone on the community’s flood insurance rate map.
- d. Erosion or Sedimentation - Stormwater discharges from construction sites where one or more acres are to be disturbed, regardless of project phasing, require a permit from the Permitting & Enforcement Division. The *General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities* (DEEP-WPED-GP-015) will cover these discharges. The construction stormwater general permit dictates separate compliance procedures for Locally Approvable projects and Locally Exempt projects (as defined in the permit). A copy of the general permit as well as registration forms may be downloaded at: [Construction Stormwater GP](#).

3. Effect on natural land resources and formations, including coastal and inland wetlands, and the maintenance of in-stream flows – The proposed project is not expected to cause negative impacts.

4. Disruption or alteration of an historic, archeological, cultural or recreational building, object, district, site or surroundings - The proposed project is not expected to cause negative impacts.
5. Effect on natural communities and upon critical species of animal or plant and their habitats: interference with the movement of any resident or migratory fish or wildlife species – The proposed project is not expected to cause negative impacts.
6. Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to create extensive detrimental environmental impact – The Water Company Land Change in Use permit application requires that the utility provide the measures that it intends to implement to ensure that toxic and hazardous materials do not negatively impact the purity of the source of public drinking water supply and the Permit will prohibit the use of pesticides.
7. Substantial aesthetic or visual effects - The project construction is expected to be completed in a short period of time. Due to the nature and timeframe of the project construction, the project is not expected to cause substantial aesthetic or visual impacts in the area.
8. Inconsistency with the written and/or mapped policies of the statewide Plan of Conservation and Development and such other plans and policies developed or coordinated by the Office of Policy and Management or other agency – The proposed project is consistent with the first policy of Growth Management Principle #1: Ensure the safety and integrity of existing infrastructure over its useful life through the timely budgeting for maintenance, repairs and necessary upgrades. It is also consistent with the first policy of Growth Management Principle #5: Utilize a multiple barrier approach, including source water protection and appropriate treatment, to ensure the availability of safe and adequate public water supplies that meet or exceed state and federal drinking water standards.
9. Disruption or division of an established community or inconsistency with adopted municipal or regional plans- The proposed project is consistent with the Municipal Plan of Conservation and Development’s recommendation to increase the operational efficiency of the public water system.
10. Displacement or addition of substantial numbers of people - No significant impact expected.
11. Substantial increase in congestion (traffic, recreational, other) – The proposed project is not expected to create substantial traffic congestion in the area. The Town will provide personnel to maintain traffic rules and public safety in the area.
12. A substantial increase in the type or rate of energy use as a direct or indirect result of the action - No significant impact expected.
13. The creation of a hazard to human health or safety - The project is not expected to create significant public hazard and safety.
14. Any other substantial impact on natural, cultural, recreational or scenic resources - No significant impact expected.

Conclusions:

Based on the DPH’s environmental assessment of this project which includes a review of the comments provided by the DEEP dated June 8, 2018, it has been determined that the project does not require the preparation of an Environmental Impact Evaluation (EIE) under CEPA. The DPH will coordinate with the Town of East Lyme to ensure that the recommendations by the DEEP are implemented.