

August 2, 2018

At Your Service

Mr. Eric McPhee
Department of Public Health – Drinking Water Section
410 Capitol Avenue-MS#12DWS
P.O. Box 340308, Hartford, CT 06134

Re: Scoping Notice for Emergency Interconnection between Ledyard Water Pollution Control Authority Water System and Southeastern Connecticut Water Authority Systems

Dear Mr. McPhee:

The following comments are submitted:

Aquifer Protection

The proposed project for the emergency interconnections are located within Aquifer Protection Areas. Best Management Practices should be utilized during construction. Connecticut's Aquifer Protection Area Program Municipal Manual entitled, *Road and Highway Construction/Reconstruction in Aquifer Protection Areas*, is available on DEEP's website www.ct.gov/deep/aquiferprotection in the Appendices Section.

These include:

1. *Road and Highway Construction/Reconstruction in Aquifer Protection Areas* on page 274-275
2. *Temporary Construction/Reconstruction in Aquifer Protection Areas* on page 281

GU Response:

Note that none of the interconnection construction work is either within or in close proximity to either of the two (2) aquifer protection areas in the Town of Ledyard as shown on the latest available map, published by DEEP as of March 23, 2018 (as available on its website).

However, we do intend to maintain Best Management Practices for construction including reduction and mitigation of impacts to surface water runoff quality through the installation of sediment fencing, hay bales, soil socks and other available sedimentation and erosion controls appropriate to the work being performed. Most of the work



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. For projects disturbing five or more acres, registration describing the site and the construction activity must be submitted to DEEP prior to the initiation of construction. A stormwater pollution control plan, including measures such as erosion and sediment controls and post construction stormwater management, must be prepared. A goal of 80 percent removal of total suspended solids from the stormwater discharge shall be used in designing and installing post-construction stormwater management measures. The general permit also requires that post- construction control measures incorporate runoff reduction practices, such as LID techniques, to meet performance standards specified in the permit.

The construction stormwater general permit dictates separate compliance procedures for Locally Approvable projects and Locally Exempt projects (as defined in the permit). Locally Exempt construction projects disturbing over 1 acre must submit a registration form and Stormwater Pollution Control Plan (SWPCP) to DEEP. Locally Approvable construction projects with a total disturbed area of one to five acres are not required to register with DEEP provided the development plan has been approved by a municipal land use agency and adheres to local erosion and sediment control land use regulations and the *CT Guidelines for Soil Erosion and Sediment Control*. Locally Approvable construction projects with a total disturbed area of five or more acres must submit a registration form to DEEP. This registration shall include a certification by a Qualified Professional who designed the project and a certification by a Qualified Professional or regional Conservation District who reviewed the SWPCP and deemed it consistent with the requirements of the general permit. The SWPCP for Locally Approvable projects is not required to be submitted to DEEP unless requested. For further information, contact the division at 860-424-3018. A copy of the general permit as well as registration forms may be downloaded at: [Construction Stormwater GP](#).

GU Response:

As stated in the Aquifer Protection response, Groton Utilities will use Best Management Practices to reduce any impacts from stormwater discharge during construction.

Idling

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. Adhering to the regulation will reduce unnecessary idling at truck staging zones, delivery or truck dumping areas and further reduce on-road and construction equipment emissions.



Discharge water will be de-chlorinated by discharging the water into a pool with de-chlorination tablets and then discharged to the ground. Most of the construction work will be in the road (pavement) area.

In addition to these protective measures, Groton Utilities recently sent in the DEEP's latest General Permit Registration Form and is aware of the terms and conditions required for this testing procedure.

PCBs

Pre-existing pipes may contain PCB contamination in caulk joints and paint. Care must be taken to properly identify and manage this material when discovered. For further information, contact the Bureau of Materials Management & Compliance Assurance, PCB Program at 860-424-3368. Additional information is also available on-line at: [PCB Program](#).

GU Response:

Groton Utilities will review existing piping on the SCWA connections. Town of Ledyard piping is typically ductile iron pipe installed less than twenty (20) years ago.

404/ 401 Water Quality Certification

It is unknown whether the pipes will be installed under the roadway or shoulders, with no direct wetland impacts, or beyond previously filled areas. If there are any undeveloped areas within the area to be impacted, it is recommended that a certified soil scientist perform a reconnaissance of the site in order to determine whether there are any areas which would be regulated as wetlands or watercourses as defined by section 22a-38 (15) and (16) of the CGS, respectively. If the reconnaissance identifies regulated areas, they should be clearly delineated. Any activity within federal regulated wetland areas or watercourses at the site may require a permit from the U.S. Army Corps of Engineers pursuant to section 404 of the Clean Water Act. Further information is available on-line at [Army Corps of Engineers, New England District](#) or by calling the Corps Regulatory Branch in Concord, Massachusetts at 978-318-8338. If a permit is required from the U.S. Army Corps of Engineers, a Water Quality Certificate will also be required from DEEP pursuant to section 401 of the Clean Water Act. For further information, contact the Land and Water Resources Division at 860-424-3019. A fact sheet regarding 401 Water Quality Certification is available on-line at [401 Certification](#).

GU Response:

Most of the construction will be in the road. One area will be off the road but no wetlands are in the area.

Stormwater During Construction

Stormwater discharges from construction sites where one or more acres are to be disturbed, regardless of project phasing, require a permit from the Permitting &



will encompass the excavation of a 4-foot wide trench within the paved road areas and, as such, soil socks will be used for runoff protection for catch basins and other diversion structures.

Water Diversion

The definition of their use of the term “emergency” should be clarified in the post-scoping notice or the Environmental Impact Evaluation. Section 22a-277(5) of the Connecticut General Statutes (CGS) exempts from the permit requirement diversions for “fire emergency purposes,” and section 22a-378 of the CGS allows for diversions in response to a state-declared water supply emergency. If neither of these conditions apply, then a permit will be needed for an interconnection between distribution systems or service areas in excess of 50,000 gallons per day in compliance with section 22a-377(b)-1(a) of the Regulations of Connecticut State Agencies (RCSA). For more information contact the Water and Planning Management Division at 860-424-3704 or online at [Water Diversion Program](#).

GU Response: The Emergency Water Supply Agreement that GU has executed with the Southeastern Connecticut Water Authority and Ledyard WPCA is for the provision of water during a public drinking water supply emergency pursuant to CGS Section 25-32b (i.e. state-declared water supply emergency). GU requests that the DPH clarify this item in its post-scoping notice.

Hydrostatic Pressure Testing Wastewater Discharge

Hydrostatic pressure testing wastewater discharges resulting from this project are authorized as “potable water system maintenance wastewaters” under the *Comprehensive General Permit for Discharges to Surface Water and Groundwater* (Comprehensive General Permit). No formal registration is required under the Comprehensive General Permit for this discharge but operating conditions and effluent limits of the Comprehensive General Permit must be complied with. The Miscellaneous and Comprehensive General Permits are administered by the Water Permitting and Enforcement Division of DEEP’s Bureau of Materials Management and Compliance Assurance. A general permit sets terms and conditions for conducting an activity which are protective of the environment. Questions can be directed to Don Gonyea, 860-424-3827, donald.gonyea@ct.gov; or Jim Creighton, 860-424-368, james.creighton@ct.gov.

GU Response:

The five (5) areas of pipe testing range from 60-feet to 300-feet in length. The pipes will be fitted with one-inch pipe taps. No valves will be opened until bacteria tests are acceptable and hydrostatic pressure testing is approved.

All disinfecting of water mains will follow AWWA Standard C651-05.



Use of posted signs indicating the three-minute idling limit is recommended. It should be noted that only 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.

GU Response:

Groton Utilities equipment is furnished with necessary emission controls to meet CT DEEP's guidelines where applicable. Equipment operators will be briefed on the State of Connecticut's regulation (RSCA 22A – 174-18) regarding excessive idle time.

Clean Vehicles

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.

GU Response:

The equipment used for this project are newer than 2007.

2018 – Kabota Excavator

2011 – New Holland Backhoe

2018 – International dump truck

2016 – Ford F550 dump truck

All other equipment have gas motors and are newer than 2007.

GROTON UTILITIES

FOR

Richard M. Stevens
Manager, Water Division & PAF