

December 16, 2025

Robin Rittgers
Water Planning & Management Division
Bureau of Water Protection and Land Reuse
CT Department of Energy & Environmental Protection
79 Elm Street, Hartford, CT 06106-5127

RE: Notice of Scoping for Town of Coventry Water Pollution Control Facility

Dear Mr. Rittgers,

The Connecticut Department of Public Health (DPH) has reviewed the Notice of Scoping (Notice) for the Town of Coventry Water Pollution Control Facility (WPCF) upgrade project proposed in the town of Coventry (Town) with a potential transmission line to Willimantic (Project).

According to the Notice, the WPCF is permitted for approximately 200,000 gallons per day (gpd), provides primary treatment, and discharges to groundwater through rapid infiltration basins (RIBs). Groundwater flows to the Willimantic River at a short distance, and the Town reports surface breakouts near the river, an indicator of a stressed or malfunctioning infiltration system. Two alternatives are under evaluation:

- 1) Upgrading and expanding treatment at the current site and changing the discharge to a treated surface-water outfall to the Willimantic River, or;
- 2) Ceasing on-site treatment, converting the facility to a pump station, and conveying wastewater via a new transmission line to the Windham WPCF for treatment and discharge to the Shetucket River.

The Town also anticipates expanding the sewer service area around Coventry Lake.

The proposed Project area(s) contain multiple public drinking water systems (PWS) and public drinking water supply wells (collectively 'Wells'). Sewer expansion can reduce septic loading where failing or high-risk systems exist but may also introduce construction and operational risks to Wells if not appropriately designed and managed. DPH offers the following comments for consideration during the continued development of the Project:

- There are numerous small public water systems located in the existing and proposed areas of sewer infrastructure. DPH recommends that a comprehensive review be conducted to ensure that none of the proposals will have sewer infrastructure encroach on the regulatory setback distances to any public water supply well. DPH and the public water systems can assist in this analysis where well location data may not be available.
- The Town should maintain the groundwater monitoring network around the RIBs to track nitrogen species, chloride/sodium, conductivity, organics, bacterial indicators, and PFAS screening. Monitoring should continue at least through alternative selection and, if the RIBs are retained, be tied to action thresholds and corrective measures.
- If any new pump stations are proposed they should be as far removed from public drinking water supply wells as possible.

- Construction, operations and system maintenance should follow the [Connecticut Guidelines for Soil Erosion & Sediment Control](#)¹ and the [Connecticut Stormwater Manual](#)².
- The Emergency Response Plan should identify risks to public water systems and include provisions for immediate notification to affected PWS operators, the Eastern Highlands Health District (EHHD), DPH and the Department of Energy and Environmental Protection (DEEP) for any release or bypass and provide for post-incident water-quality monitoring of any potentially impacted well.
- Coordination with each PWS and EHHD is strongly recommended before and during construction. DPH recommends that the Town provides each with a copy of current plans, points of contact, and reasonable access for observations during construction, commissioning of pump stations, and force-main pressure testing.

Thank you for the opportunity to review and provide comments on this Project. Should you have any questions, please contact Lisette Stone of my staff at Lisette.Stone@ct.gov.

Sincerely,



Lisa Michelle Morrissey, MPH
Deputy Commissioner

¹ Connecticut Guidelines for Soil Erosion & Sediment Control, publication date September 30, 2023, https://portal.ct.gov/-/media/deep/water/water_quality_management/guidance/sescg_cleanfinal.pdf?rev=7a4cbf1406e841799148b1f8d4033f80&hash=679015A2EC8F068083F9F15B8A13AF90.

² Connecticut Stormwater Quality Manual, publication date September 30, 2023, https://portal.ct.gov/-/media/deep/water/water_quality_management/guidance/swm_mar_2024.pdf?rev=1dafa8e03ca4ec98f5ec011d803f4dc&hash=A49802ED8F721C491C85776C3E77CF51