

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

From: Linda Brunza- Environmental Analyst

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Date: 4/14/2022

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Subject: Scoping Notice for Bergstrom Wellfield and Treatment Plant in Bethel

The Department of Energy and Environmental Protection (DEEP) has received the Notice of Scoping for the project proposed by the Department of Public Health for the construction of a new water treatment plant building and treatment process, which includes the installation of a well pump, piping, and electrical equipment. A water transmission main will be constructed to connect to the existing distribution system on Plumtrees Road. The following comments are submitted for your consideration.

Aquifer Protection

The Bethel Water Department's *Maple Avenue Aquifer Protection Area* mapped boundary enters the property parcel of 49 Plumtrees Road at the most southern property line. The project area will be at the Bergstrom Well and Water Treatment Plant which is located north and outside the aquifer protection area, according to the map of the project area. The map of the project area should be revised to include the Bethel Water Department's Maple Ave Aquifer Protection Area and labeled as such.

The State Aquifer Protection Land Use Regulations can be downloaded at: [Aquifer Protection Regulations](#). For additional information on aquifer protection please contact the Land and Water Resources Division at 860-424-3335.

Water Diversion

A Consumptive Water Diversion permit was issued for this wellfield on 12/4/19 for a maximum daily withdrawal of 1.152 million gallons per day. Doug Hoskins of the Consumptive [Water Diversion Program](#) may be contacted at 860-424-4192 or douglas.hoskins@ct.gov for more information.

Natural Diversity Database- Wildlife Division

The Natural Diversity Database is a record of state or federal listed species maintained by the Wildlife Division that may be found in the project area. An application has already been submitted for this project and a Determination Letter; No. 202112000, was issued. For any questions, please contact the analyst listed in the Determination Letter. For general information concerning NDDB reviews please on-line at [NDDB Requests](#).

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 Jim Creighton, 860-424-3681, james.creighton@ct.gov.

404/ 401 Water Quality Certification

Without a detailed site or location plan, DEEP recommends that a certified soil scientist perform a reconnaissance of the site 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 Connecticut General Statutes (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. The project may fall under the perimeters for Self-Verification for Corps permitting. 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](#).

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. 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.

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.

Thank you for the opportunity to review this project. These comments are based on the reviews provided by relevant staff and offices within DEEP during the designated comment period. They may not represent all applicable programs within DEEP. Feel free to contact me if you have any questions concerning these comments.

cc: Camille Fontanella, DEEP/ OPPD