

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

<b>Date:</b>	July 22, 2014	<b>Staff Contact:</b>	Eric McPhee
<b>Applicant PWS Name:</b>	Town of Marlborough	<b>Town:</b>	Marlborough
<b>Project Name:</b>	Marlborough Town Center Water Main		
<b>PWSID:</b>	CT0798013		
<b>Funding Source:</b>	STEAP		
<b>State Funds:</b>	\$500,000.00		

**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 Marlborough proposes to construct a water system to provide public water supply to an area currently supplied by individual wells and non-community public water systems. The existing wells in the area suffer from various water quality issues and the water system is intended to address the need for an adequate and safe water supply. The Town has been awarded a grant through the 2013 Small Town Economic Assistance (STEAP) program to fund a portion of this project.

**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 – The proposed project is not expected to cause significant adverse air quality effects.
  - b. Water Quality - The proposed project is not expected to cause significant adverse water quality effects to the adjacent watercourses. The Department of Energy and Environmental Protection provided comments on possible stormwater discharges. 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. For projects disturbing five or more acres, registration describing the site and the construction activity must be submitted to the Department 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.

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 the Department. Locally Approvable construction projects with a total disturbed area of one to five acres are not required to register with the Department 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 the Department. 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 the Department 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](#).

- 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 Town of Marlborough has expanded the well field that serves its existing Municipal Water System, a Non-Transient Non-Community system. The DPH approved safe yield of the expanded supply system is over 50,000 gallons per day and is expected to be able to supply the anticipated demands created by the construction of the Town Center Water Main. In order to facilitate coordination of potential diversion permitting, the DPH has provided copies of the approvals associated with the expansion of this system to the DEEP Inland Water Resources Division.
    - b. Groundwater –The Town of Marlborough monitored nearby water supply wells pursuant to Connecticut General Statutes Section 25-33(b) during the yield test conducted on the expanded supply system. No adverse impacts were noted. The water from the new wells was sampled and analyzed for all regulated contaminants and numerous unregulated parameters and the quality was found to be acceptable for public consumption. Water quality of the existing wells is monitored on an established schedule and consistently meets regulatory requirements.
    - c. Flooding –The proposed project is not located within the 100-year flood zone on the community’s flood insurance rate map.
    - d. Erosion and Sedimentation— In order to protect wetlands and watercourses on and adjacent to the site, strict erosion and sediment controls should be employed during construction. The Connecticut Guidelines for Soil Erosion and Sediment Control prepared by the Connecticut Council on Soil and Water Conservation in cooperation with DEEP is a recommended source of technical assistance in the selection and design of appropriate control measures. The 2002 revised edition of the Guidelines is available online at: [Erosion Control Guidelines](#).
  3. Effect on natural land resources and formations, including coastal and inland wetlands, and the maintenance of in-stream flows –The Town should coordinate with the local Inland Wetlands and Watercourses Agency to ascertain whether a permit will be required for this project. Since the proposed water supply system for the Marlborough Town Center has the capacity to produce more than 50,000 gallons of water per day; the Town must apply to the DEEP for a water diversion permit pursuant to CGS Section 22a-368. Wells with a capacity of no greater than 250,000 gpd from either a stratified drift or bedrock aquifer may be eligible for a general permit (DEP-IWRD-GP-012). A diversion is authorized under this general permit upon receipt by the DEEP of a complete and sufficient request for authorization and subsequent issuance to the requester of a formal letter of authorization from the DEEP. For further information, contact the division at 860-424-3019. Fact sheets regarding IWRD permit programs and permit application forms can be downloaded at: [IWRD Permits](#).
  4. Disruption or alteration of an historic, archeological, cultural or recreational building, object, district, site or surroundings – The Marlborough Tavern, a property listed on the National Register of Historic Places is within the proposed project corridor. The State Historic Preservation Officer has reviewed the construction documents for this project and indicated that proposed project will cause no adverse effect to the historic property.

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 –No significant impact expected.
6. Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to create extensive detrimental environmental impact - No significant impact expected.
7. Substantial aesthetic or visual effects - 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 project is located in a Village Priority Funding Area, therefore no significant impact is expected.
9. Disruption or division of an established community or inconsistency with adopted municipal or regional plans- No significant impact expected.
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.
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 - Development plans for utilities in urban areas that entail soil excavation should include a protocol for sampling and analysis of potentially contaminated soil. A soil management plan should be developed for the project to deal with soils during construction. The DEEP's *Guidance for Utility Company Excavation* should be used as a guide in developing the plan. The guidance is available on-line at: [Utility Guidance](#) . The project is not expected to create a hazard to human health or safety. In fact, the purpose of the project is to provide a safe and adequate drinking water supply to an area of the Town Center utilizing individual wells with known pollution, low water supply and poor aesthetic quality.
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 comments provided by the DEEP dated May 8, 2014 and the SHPO dated May 2, 2014 and June 11, 2014, 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 Marlborough to ensure that the recommendations by the DEEP are implemented.

**Recommendations:**

If the water line is to be pressure tested and disinfected, the discharge would be covered by the *General Permit for the Discharge of Hydrostatic Pressure Testing Wastewater* (DEP-PERD-GP-011). This general permit applies to all discharges of waters used to test the structural integrity of new or used tanks and pipelines that hold or transfer drinking water, sewage, or natural gas. The general permit contains pH, chlorine, oil and

grease, and suspended solids limits which will need to be complied with during the testing and verified through monitoring. Registration is required to be submitted to the Department in order for the discharges to be authorized by this general permit. A fact sheet, the general permit which includes the registration form, titled Notice of Coverage, and the Application Transmittal form may be downloaded at: [Hydrostatic GP](#).

Prior to starting the project construction, the following best management practices should be considered:

1. **Construction Maintenance:** No construction should take place before erosion and sedimentation controls are installed. These controls should be properly installed, maintained, inspected regularly, and remain in place until the project construction is completed. During construction and until a vegetative cover is reestablished, the project area should be inspected daily and after rainfall to verify erosion control measures are properly functioning. Any defects on the structure must be immediately repaired.
2. **Emergency Response Plan:** Develop an Emergency Spill Response Plan before construction begins. Spill response equipment should be available on-site at all times along with personnel trained in the proper use of such equipment.
3. **Hazardous Materials Storage:** Hazardous materials should be removed from the site during non-work hours or otherwise stored in a secure area to prevent vandalism. Place covered trashcans and recycling receptacles around the site. Cover and maintain dumpsters. Check frequently for leaks. Place dumpsters under a roof or cover with tarps or plastic sheeting. Never clean a dumpster by hosing it down on site.
4. **Vehicles and Machinery:** Methods and locations of refueling, servicing, and storage of vehicles and machinery should be addressed and included as notes on the final site plans. All equipment fueling or minor repairs should occur on a fueling pad. Onsite fuel storage for heavy equipment should have containment and be located in a secure area where it will not be vandalized or struck by equipment or vehicles on the job site.