

## **Appendix I**

### **Tylerville Public Hearing Comments and Correspondence and Responses**

## APPENDIX I

### Public Hearing on Draft Water Supply Alternatives Evaluation Responses to Comments and Correspondence Received

#### Comments received at Public Hearing, Haddam Fire House, June 21, 2017:

##### Comment

**Jackie Gardell** - Asked DEEP to consider putting in shut-off valves for homes that do not have basements.

##### Response

*Thank you for your comment. Necessary shut-off valves will be included in the design documents.*

##### Comment

**Stephen Gephard** – Representing Camp Bethel on Camp Bethel Road. Thanked everyone for their presentations that were very good, very informative. Many of their questions have been answered. Will probably submit written comments. Camp Bethel has been doing a lot of testing regularly through not only DEEP but also the Dept. of Public Health. Our water is clean right now. We value our wells. We are very interested in the system and are very happy that clean water is coming to our neighbors. We have some concern about being hooked up into this system while we have clean water. I'll leave it at that for now. We'll continue to gather more information from all the parties. Thank you.

##### Response

*Thank you for your comment.*

##### Comment

**Jeffrey Muthersbaugh** – My wife and I own the nearby Brainerd House on Saybrook Road in Haddam. I wanted to thank you. I think that if there ever was a function of government, this is it – to provide, to have a segment of our population without potable water for 40 years, it's unacceptable. To be able to remedy this problem is long overdue and we need this. This is what separates us from third world countries, so to be able to have potable water for our people is pretty basic. Thank you.

##### Response

*Thank you for your comment.*

##### Comment

**Ed Veselak** – I'm at 1618 Saybrook Road. I'd like to thank everybody from Connecticut Water Company, DEEP, Public Health, and all of that. I know most of you folks and I've talked to you a few times on the phone and over the years. I think Tylerville really needs to get on board with this project because it's all needed. I rent buildings and sometimes not having water and then it kind of weighs on the septic system, too. It's a double-edged sword. If you have water, clean water is great because then your septic system is probably not required as much. The other thing is that it's going to bring people to Tylerville. Maybe bring a laundromat and other types of things that couldn't go into Tylerville. And I

think that would be good. We had stuff in the past but unfortunately, it didn't work because of water or sewer or just other things. I think that bringing the line up from Chester is a great idea because I own property in Chester also and it's close by. Fire protection is a great thing, I also think, because I've seen too many times we'll have a fire and the guys have to run for water down. It's down at the Connecticut River. From there, you'll have an emergency or something. I've seen it time and time again. The other thing is, I feel that if you could bring a 12" pipe up, that would be great to the fire crew and if it could cross over the railroad tracks down with an 8" and go around the other way, that would be nice. Could save that way. Fire hydrants are important in Chester, too, if that will be along the line at some other point, maybe. Who knows? In Haddam, it would be a great thing because I'm sure that the fire department needs it. And I'm in favor of this. I do a lot for the water at my place to make safe drinking water to do all of the tests we have to pay for. All in all, thanks for all of this and hopefully it comes to be, because I've signed up several times for this to do the study, and I said I would hook up to it. I appreciate the time that everybody has put into this. Thanks very much.

### **Response**

*Thank you for your comment. As detailed in the Tylerville Center Water Supply Alternatives Evaluation Report, the study included analysis of an 8" and 12" diameter water mains. The 8" water main will provide adequate water supply as well as provide fire protection flows as noted. In addition, the selected 8" water main alternative is consistent with the State Conservation and Development Policies Plan as well as the Town of Haddam and Town of Chester Plans of Conservation and Development.*

### **Comment**

**Polly Champ** – My comment was already made. She agrees with the previous comment.

### **Response**

*Thank you for your comment.*

### **Comment**

**Arthur Collins, Jr.** – Once again everybody is speaking in here, it's so good to see this water coming in. It's a shame we have to be here to do this because a lack of regulations or enforcing regulations allows a company to just deposit this pollution that is the cause of this. Now these people are going to have fresh water in their homes and will cause their values to go up. I know four years ago when I was looking for a home with my three daughters, that was one thing I checked out was the well water. I saw a home and how beautiful it was but when I saw all the filters and stuff like that, I said forget it. I ain't going to buy that. I'll go to some other place. That's going to be a good thing, it's going to add to the value. As far as rules and regulations, they always can change and then someone all of the sudden comes in and don't like something, they'll take them to court and they file lawsuits and it's not good. And as I said, coming down the road where we have all these restaurants and stuff and 20 years down the road something along this line you have laundromats, all of the sudden the 8" line may have some problems because it sounded like as long as everything's a certain way, it will be okay. Well, if not, we'll run into some problems. Gee whiz, why didn't 20 years ago they change this? My comment is, with the cost of the increase, maybe it's worthwhile looking into the cost of the 12" line. (Inaudible) Thank you.

### Response

*Thank you for your comment. As detailed in the Tylerville Center Water Supply Alternatives Evaluation Report, the study included analysis of an 8" and 12" diameter water mains. The 8" water main will provide adequate water supply as well as provide fire protection flows as noted. In addition, the selected 8" water main alternative is consistent with the State Conservation and Development Policies Plan as well as the Town of Haddam and Town of Chester Plans of Conservation and Development.*

### Comment

**Maryanne Muthersbaugh** – I want to say that I'm for this 100%. I think the presentation was terrific. I'd like to see some sensitive businesses along that route. It would be terrific to have restaurants, laundromats. I'm repeating what everyone else said, but I think that's great.

### Response

*Thank you for your comment.*

### Comment

**William Robbins** – I'm the Fire Marshal for the Town of Haddam. From a public safety standpoint, this is a no-brainer. A minimum of an 8" pipe if it's an engineering issue, 8" vs. 12", but if 8" pipe is adequate and gives us a fair amount of fire flow, the fire department is very much in favor of it. I also wanted to point out one thing I noted in the back, you call for 21 hydrants. We can do it for a lot less than that. You won't need 21 hydrants, so that's something you can consider.

### Response

*Thank you for your comment. As detailed in the Tylerville Center Water Supply Alternatives Evaluation Report, the study included analysis of an 8" and 12" diameter water mains. The 8" water main will provide adequate water supply as well as provide fire protection flows as noted. Final selection of hydrant locations will be made in conjunction with the Town of Chester and Town of Haddam and Connecticut Water Company. A preliminary discussion with regard to hydrant locations indicates less than 21 hydrants may be acceptable.*

### Comment

**Marge Supple** – I live at 116 Little Meadow Road. I want to thank the CT DEEP for coming down ever since we lived there to test the water here. Thank goodness we're one of the ones that don't have pollution yet so right now. I did want to bring to everyone's attention that Little Meadow Road is a private road and the property owners take care of the road. My concern was if, you know, the construction company comes in and puts in the water way, what's going to happen to our road? Are we going to have to restore it? I know Haddam does not take care of our road at all. Like I said, the property owners do. There's also a right of way that we have with Little Meadow Road. I know when we purchased our home 25 years ago, we did not have any running water or electricity. We had to buy the lot ahead of us who was blocking the power from going down the road, and my husband would not let the electricity go down the road until all the property owners took a (inaudible) to it. So it's been 25 years ago since electricity went down the road. I don't know if there might be an issue with all of the property owners not allowing the water to go down. Also, Little Meadow Road has about 6-7 year-round homes on the road as well. Our home is year-round. We haven't the past couple years lived

there year-round but we are farther on down the road. The year-round homes aren't just at the end of the road.

**Response**

*Thank you for your comment. The intent of the project will be to replace and restore any areas disturbed as a result of the water main installation, including roadways. Resolution of property access and/or rights-of-way will be addressed during the final design process.*

**Comment**

**Doug Dole** – I live on Camp Bethel Road and my property is the first property north of the Study Area, so the line won't make it to where my property is located. But there was a mention of an unpredictability in the plume. TCE, which I believe, at one time, had been detected at Camp Bethel, in one of their wells. That's how it looks like on the map. My concern is for future contamination from either the currently known sources or from potential unknown sources and having the line move north more on Camp Bethel Road. Otherwise, I support this anyway. I think the ability to have fire hydrants on Camp Bethel Road is good even though I'm a few hundred feet north of where the line is, I'll benefit from that so I appreciate that. And it will be nice to have the property values go up a little bit. Thank you again for the presentation you all did and thanks for taking our comments.

**Response**

*Thank you for your comment. The limits of the Water Supply Study Area, as shown on Figures 2 and 3 from the Water Supply Alternatives Evaluation Report, have been conservatively established. Based on the historic collection of groundwater laboratory data and the current understanding of the impacts to groundwater in the area, it is highly unlikely that the Tylerville Center groundwater contamination would migrate outside of the Study Area limits.*

**Comment**

**Sharon Botelle** – I live at 81 Bridge Road. I live across the street from Dunkin' Donuts, and I've been living with this from 38 years. I just want to say thank you.

**Response**

*Thank you for your comment.*

**Comment**

**Representative Bob Siegrist** – I want to echo some of Jeff's comments. State government, local government, and private sector coming together is a good thing and this is a prime example of it. It's good, most important for health, public safety, as well as economic development. It really is good to see everybody here. I want to thank everybody, all parties involved, Shannon – I don't know how many conference calls we've been on with a bunch of people, so thank you. This is a great community and it's good that we're all sticking together. Thanks again.

**Response**

*Thank you for your comment.*

### **Comment**

**First Selectman Lizz Milardo** - I just want to, first of all, thank everyone involved. Shannon, I think we've spent countless times in meetings with everyone from AECOM to Connecticut Water. This is something that I have to give kudos to Liz Glidden, our Town Planner. She has really helped me with this project. She is the one with the history. I'm really happy that we're getting to come to a resolution for the residents of Tylerville. I think it's a great thing for Haddam. I just want to thank everyone for their support.

### **Response**

*Thank you for your comment.*

### **Comment**

**First Selectman Lauren Gister** – Thank you. I just want to say, although it's been said about five times already, that watching agencies be able to coordinate this depth of investigation is really wonderful. As Haddam's neighbor we appreciate that it doesn't look like Chester has great big part in this and that there's not a lot of obvious benefit to the Town of Chester. But I can tell you that I see a huge benefit in doing the right thing and this is clearly the right thing to do. As First Selectwoman, my concern is for the residents and tax payers of Chester and I know that some of their concerns will be some of the things that were talked about tonight, both with regard to hydrants, which not only saves them money on insurance but also costs them money in their taxes. Also the ability to tie into the public water or not tie into the public water, and the design and timing parallel to what Chester has planned in other areas. I appreciate the opportunity to be a part of this, and nice work everybody.

### **Response**

*Thank you for your comment.*

## **Written Comments Received During Public Comment Period, June 10, 2017 – July 10, 2017:**

**Lisa Wadge** - Thank you for the presentation last night. I have a comment that the maps are extremely misleading because they depict all contamination over a 30 year period. Our site is clean, is not an establishment and has not had MTBE in the water supply well it for many years. When it was detected it was only at trace levels, yet our entire site is shown as a contaminated site. In addition we are in a different aquifer yet that is not discussed or mapped either. We request that the maps be edited to depict 1) current and historic contamination separately, 2) the mtbe and tce plumes separately and 3) the aquifer divides to better document current conditions.

While we are looking forward to the potential of city water for our site, we object to our site being mapped as having groundwater contamination as this is having an adverse effect on our ability to develop our property as planned and approved by the town of Haddam. Maps need to reflect our site as in the area of city water but not in the contamination area in a clearer and more scientifically correct manner. Thank you Lisa Wadge DBP LLC

### **Response**

*Thank you for your comment. Historic detections and exceedances of relevant regulatory criteria of contaminants have been depicted on the figures included in the Tylerville Center Water Supply Alternatives Evaluation Report. Distinction between contaminants is depicted on Figures 2 and 3 in the Report. The properties you reference appear to be up- or cross-gradient from the groundwater plume but as noted in the Report, the bedrock aquifer is complex.*

### **Comment**

#### **Ed Schwing**

The following are my comments/concerns (page number references are to the AECOM report)

#### **1. On page 1.1 under documented release areas:**

It is quite unfair and misleading to list all those releases without a brief qualifier indicating their current status and proportional contributions.

For example the Botelle property has been remediated and currently no indications of TCA (their release). Mobil (MTBE) has entered into a consent order, remediated and provides water to neighbors and plume is dissipating. Luke Oil (MTBE) release was terminated. CTDOT 105 Bridge Rd: (Sodium, VOC): some remediation has occurred (septic removed and surrounding area) current sampling indicates only presence of as from natural source. Camelot Cruise: wells in area have highest concentration of TCE but no documented releases of that magnitude if any; only that contaminated soil was removed in 1983. Possibility of an external source affecting these high readings should be clearly stated (this is like making the victim responsible for the crime).

By listing all as equal potential sources it gives the false impression that they have contributed, or continue to contribute, in equal proportion to the pollution.

In fact MTBE should be listed as separate issue affecting fewer properties and bound to go away before TCE is resolved.

## **2. Community Groundwater Supply Alternative page 3.1**

This is one of the weakest parts of the report. The consultants did not even bother to investigate this alternative thoroughly and just copied and pasted what was in the Weston and Sampson Engineers, Inc. (WSE) 1999 report.

That 1999 report only looked at one potential property for a local supply of water, ignoring the advice of resident and Wesleyan Geology Professor Jelle deBoer at the time regarding the possibility of locating those wells upgradient of water running towards Tylerville, namely the west side of RT 154. (Sadly Dr. deBoer passed away in 2016).

The state owns most of the land surrounding RT 82 connector in that area, which we would think would help facilitate a local water source. But what is even more troubling in this report, the consultant statement on page 3.2: "there is no suitable land under the ownership or direct control of the Town of Haddam" is false. Indeed the Town of Haddam owns about 63 acres of open space land west of 154 and South of RT 82 connector. Close to the Chester border and about a mile from the intersection of 154 with 82 (see attached PDF with GIS map with lot 67 - 003 in red). The consultants owe the residents to investigate this possibility more thoroughly with specific detailed costs and estimates rather than simply updating the unlikely scenario of 1999.

Limiting water distribution only to affected properties in Tylerville and having local municipal control of that water distribution would be meet high public acceptance.

The dismissal of the Community Groundwater Supply Alternative early in the study process gives the impression that this study had a predetermined conclusion, namely that the extension of the Connecticut Water Company was the only viable option.

## **3. The 12 Inch vs 8 Inch issue.**

The 12 Inch option as discussed on page 5-6, is a red herring. 12 inch main is not needed and 8 inch main will be sufficient for fire protection as indicated by our fire marshal at the hearing. The water company just wants the taxpayers to foot the bill for their future expansion. This would be corporate welfare pure and simple.

## **4. How about Water Company Contribution?**

Talking about corporate welfare, how come there are no provisions for the water company to participate financially in this project. They make good profits and they should be asked to contribute substantially to a project that will create even more profits for them down the line. In a capitalistic society that is what profits are for.

## **5. The Pollution Source**

TCE does not fall from the sky. Very disturbing is the fact that in the total price estimates there are no provisions made for the polluter(s) to help defray any of the costs once a determination is made of who is responsible. In fact the polluter(s), in the current scenario, are bound to benefit financially, turning the concept of environmental justice on its head.

I forgot to send this GIS map with my letter. Could you please add this as well as my description below to the record? This is for my comment on the community well supply option



# GIS Map for Community Well Option

The area in red is the 63 acres owned by the town of Haddam parcel ID 67 003

It is abutted by State of Connecticut lots 65 016 2A (39 acres) and lot 64 008 (260+acres) up to RT 82 connector. Thank you

http://hosting.tighebond.com/haddamet\_public/index.html#info-address

Haddam, CT Web GIS

Name, Address, Parcel ID

**Search Results**

Parcel Details

**HADDAM CHESTER LINE**

**NO IMAGE AVAILABLE**

**HADDAM TOWN OF**  
30 FIELD PARK DR  
HADDAM, CT 06438  
Parcel ID: 67 003  
Lot Size (SF): 63 00 AC  
Total Value: \$0.00

Links: Abutters, Property Map, Photo, Filter Distance, Google Map, gjaacent, Adjacent

Identify Layers About

WATER PROTECTION AND LAND REUSE  
JUN 28 2017  
REMEDICATION DIVISION

Go to link to the current map view: 0.3mi

6/26/17, 5:04 PM

1 of 2

## Response

Thank you for your comments. The following responses are offered to the numbered comments:

1. *The intent of the Tylerville Center Water Supply Alternatives Evaluation Report is to present the historic contamination of groundwater in the Tylerville Center area and to evaluate alternatives for water supply to the properties within the Study Area. A detailed evaluation of the releases or relative contributions of releases is beyond the scope of the current Report. DEEP is evaluating potential sources of pollution to the groundwater in a separate study.*
2. *The alternatives presented within the Report were evaluated fairly and without bias to a pre-determined selection. The development of a community groundwater supply is a complex and time consuming alternative. In addition, as presented in the Report, identification of a groundwater source capable of meeting demand and quality requirements is highly uncertain. The parcel owned by the Town of Haddam that is referenced in the comment is protected open space located in an upland area that is not readily accessible (no nearby roads or infrastructure). The overburden in this area is mapped as thin till deposits; therefore, bedrock wells would be the water supply source. Typically, stratified drift and sand and gravel deposits found in river valleys are preferred for locating community water supply wells based on high water yields. The water yield in bedrock wells is uncertain, as is the water quality. As noted in the Report, area bedrock contains naturally occurring arsenic, which may adversely impact water quality in a new bedrock well and require expensive treatment to remove. Further, Connecticut Water Company holds the exclusive services rights to the Study Area. As such, any new water supply system developed to serve Tylerville would ultimately be managed by Connecticut Water Company. Leveraging Connecticut Water Company's existing water supply and infrastructure in the Town of Chester with available water quantity of known quality is the prudent and economical alternative given the unique characteristics of the current conditions.*
3. *As detailed in the Water Supply Evaluation Report, the study included analysis of an 8" and 12" diameter water mains. The 8" water main will provide adequate water supply as well as provide fire protection flows as noted. In addition, the selected 8" water main alternative is consistent with the State Conservation and Development Policies Plan as well as the Town of Haddam and Town of Chester Plans of Conservation and Development.*
4. *The intent of the project is to provide an adequate water supply to those properties that have been impacted or are at-risk of becoming impacted by historic groundwater pollution in the Study Area. Section 22a-471-1 of the Regulations of CT State Agencies (RCSA) establishes the regulatory framework for "Grants to Municipalities and Water Companies for Potable Water Supplies" for situations "where groundwater pollution has rendered existing supplies unusable for potable drinking water." Connecticut Water Company has contributed significant expertise to the planning of the project and, as the holder of the Exclusive Service Provider rights, will operate and maintain the system upon project implementation. Service rates will be set in accordance with the Connecticut Public Utility Regulatory Authority and are summarized in the Report and detailed in Appendix E.*
5. *Extension of the Connecticut Water Company water main, to be funded in part by the State of Connecticut, does not preclude the State from seeking restitution from responsible parties associated with the contamination in the Tylerville Center area.*

**Comment**

Please see attached Connecticut Water Company June 28, 2017 correspondence.

Connecticut Water Company  
93 West Main Street  
Clinton, CT 06413-1600  
  
Office: 860 669 8636  
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Customer Service: 800.286.5700



June 28, 2017

WATER PROTECTION AND LAND REUSE

Via Electronic Mail

JUN 28 2017

Ms. Shannon Pociu  
Department of Energy and Environmental Protection  
Remediation Division  
79 Elm Street  
Hartford, CT 06106

REMEDIATION DIVISION

**Re: Tylerville Center Water Supply Alternatives Evaluation**

Dear Ms. Pociu:

Connecticut Water has long supported the extension of water service to Tylerville as a practical, permanent solution to localized contamination issues and is cautiously optimistic such a solution is at hand. We applaud the efforts of all parties – state agencies, municipal leaders, and legislators – to arrive at this point, and are pleased Connecticut Water is identified as the recommended alternative. We take pride in our ability to provide high quality water service throughout our 56 service towns and look forward to serving the families and businesses of Tylerville.

As you know, Connecticut Water cooperated with AECOM throughout the preparation of their "Tylerville Center Water Supply Alternatives Evaluation Draft Final" report of June 2017. There are a few items, however, that bear comment.

Section 5.2.7 *Capital Cost and Operating and Maintenance Cost Estimates* (page 5-10) and Appendix G identify estimated capital costs of \$225,200 and \$232,400 for the installation of hydrants on an 8-inch and 12-inch main, respectively. As noted during the public hearing of June 21, the 22a-471 program does not cover such costs and fire protection would be at the municipality's discretion and potential expense to install. While correct that the placement of hydrants resides with the local fire marshal, it is Connecticut Water's practice to pay for the material and installation costs of any public fire hydrants installed along a water main such as this. Therefore, while unallowed for state funding purposes, the installation of hydrants under either an 8-inch or 12-inch scenario would not be borne by Haddam (or Chester). Similarly, Connecticut Water would assume any incremental expense associated with the installation of a 12-inch water main alternative, was that to be the Town's preference, as some suggested at the public hearing. Future fire protection charges would be the town's responsibility.

Section 6.1 *Recommended Alternative* notes that properties within the Study Area would be authorized to connect to the proposed distribution water main. However, as proposed, properties along Route 154 from Denlar Drive in Chester to the Study Area in Haddam would only be authorized to connect to the water main if a local health department, CT DPH, and/or CT DEEP determines that the property must be connected to correct a public health problem on the property (Page 6-2).

June 28, 2017

While this limitation is recommended to ensure consistency with state and local plans of conservation and development, it is too restrictive. As currently drafted, the language precludes existing property owners with no planned change or expansion of their current use – owners who simply want the safety, reliability, and confidence that public water supply affords – from connecting to the system.

A similar need to maintain consistency with state and local plans of conservation and development recently arose when the extension of water from the Company's Northern Western system in Tolland to Mansfield and the University of Connecticut was contemplated. That project, for which an Environmental Impact Evaluation was completed, does allow for water main to be installed in areas that are designated as conservation and other lands outside of Priority Funding Areas (PFAs).

Outside PFAs, the State Plan's policies do support the introduction or expansion of public water and/or sewer services at an appropriate scale when there is a demonstrated environmental, public health, public safety, economic, social, or general welfare concern. For the Mansfield/UConn project, service connections are thus allowed when one or more of these criteria are met. This allows for a reasonable level of water service, while ensuring consistency is maintained with applicable conservation and development plans.

Connecticut Water suggests that similar language be employed for that portion of the Tylerville water main extension outside the Study Area, e.g., that *"connections to the water main would be allowed, but only upon a determination by a state or local agency, within their applicable authority, that the connection is necessary to address a demonstrated environmental, public health, public safety, economic, social, or general welfare concern, and that any such water service connection is consistent with the state plan of conservation and development prepared pursuant to C.G.S. §16a-24 et seq."*

Such language achieves the appropriate balance between meeting the public's expectations for water service and mitigating concerns over potential inconsistency with conservation and development plans.

We appreciate the opportunity to comment and – more importantly – the opportunity to be part of the solution to providing potable water to Tylerville.

Very truly yours,



David L. Radka  
Director of Water Resources & Planning

Cc: L. Milardo, First Selectman, Haddam  
Lauren Gister, First Selectwoman, Chester  
L. Mathieu, DPH

### **Response**

*Thank you for your comment letter. The Town of Haddam has selected the water supply alternative that includes installation of 8" diameter water mains. Discussions with the Towns of Chester and Haddam resulted in the conclusion that there is not a strong need for public water to be provided in the transmission corridor as identified on Figures 5-A and 5-B of the Water Supply Alternatives Evaluation Report. The selected alternative is consistent with the State Conservation and Development Policies Plan as well as the Town of Haddam and Town of Chester Plans of Conservation and Development. Properties within the transmission corridor will be allowed to connect to the water main if a local health*

*department, CT DPH, and/or CT DEEP determines that the property must be connected to the water main to correct a public health problem.*

**Comment**

Please see attached APEX Companies July 10, 2017 correspondence.



**VIA EMAIL ([Shannon.pociu@ct.gov](mailto:Shannon.pociu@ct.gov)) AND U.S. MAIL**

July 10, 2017

Ms. Shannon Pociu  
Environmental Analyst 3  
Connecticut Department of Energy and Environmental Protection  
Waste Management Bureau  
Remediation Section  
79 Elm Street  
Hartford, CT 06106-5127

RE: Draft AECOM Report "Tylerville Center Water Supply Alternatives Evaluation" (June 2017)

Dear Ms. Pociu:

On behalf of Mercury Fuel Service, Inc. (Mercury), this is to provide comments regarding the above-referenced draft report, and to request clarifications and corrections regarding certain points.

As you know, Mercury owns and operates the gas station/convenience store at 1598 Saybrook Road (Tylerville Mobil), and has incurred significant costs in investigating and remediating MTBE and other petroleum release impacts or potential impacts at and in the vicinity of its facility. Mercury has done so even though there are multiple other known or potential sources of MTBE in the vicinity which have received little or no investigation. Also as you know, Mercury's investigation and remediation efforts have been very effective. MTBE levels are now encountered in only a few monitoring wells, all of them on-site, and in all cases below applicable remedial standards. In addition, of the remaining eight potable wells still voluntarily monitored by Mercury under DEEP oversight, none have an exceedance of CTDPH action levels for any petroleum constituents.

While much of the draft report addresses substances or locations not relevant to Mercury, certain other points in the draft relevant to Mercury are not accurate or complete as stated, and should be corrected in the final report. These points include:

1. Correct the reference to Mercury's monitoring of drinking water wells as non-voluntary.
2. Include the additional documented release sources in the Study Area.
3. Distinguish between releases with significant investigation and remediation versus releases with limited or no investigation and remediation.
4. Distinguish between historic and residual MTBE impacts at the western border of the Study Area versus ongoing (or increasing) impacts of other substances elsewhere in the Study Area.

5. Distinguish between the cost of continuing to maintain already-installed individual water treatment systems for declining residual MTBE impacts, versus the cost of new individual water treatment systems for other substances in other parts of the Study Area.

Comments on each of these points follows.

1. The reference in the draft report to Mercury's drinking water well monitoring should be corrected to reflect that Mercury has been conducting this monitoring voluntarily.

As DEEP is aware, in addition to its investigation and remediation work, Mercury has been monitoring under DEEP oversight up to 19 drinking water wells in the vicinity of its facility and other confirmed petroleum release sources. As you appropriately noted at the recent public meeting in Haddam, Mercury has done this work voluntarily in response to DEEP's request, as part of Mercury's good-faith cooperation with DEEP. However, the draft report (section 2.3.1, p. 2-4) states that DEEP has "required" Mercury to conduct this monitoring. This is inaccurate and should be corrected.

2. The final report should include additional documented gasoline or other petroleum release sources in the Study Area that are omitted in the draft report.

The list of release sources in draft sections 1.1 (Study Area Description) and 2.3.1 (Documented Release Areas) omits several documented gasoline or other petroleum releases. These should be included:

- 112 Bridge Road: Former gasoline service station (operated as Texaco, Amoco, then Marta's MiniMart/Berkshire General Store): As documented in an DEP Emergency Incident Report and Inspector's Report dated April 16, 1990 (attached), release impacts were found in site soils when the on-site USTs were excavated on April 14, 1990. One of the excavated USTs was found to have holes, which had been fitted with plugs. An unknown volume of impacted soils was reportedly excavated from the tank grave at that time.

In addition, as documented in an internal DEP/LUST Trust Program memo dated January 21, 1998 (attached), approximately 20 gallons of diesel fuel were released to the ground at this site on October 6, 1997. A limited volume of soils were excavated two months later.

- Corner of Saybrook Road and Bridge Road: Motor vehicle accident: In December 2005, approximately 15 gallons of gasoline were reportedly released due to a motor vehicle accident. There is no indication that any of it was recovered, or otherwise of any investigation or remediation efforts.

In addition, for a complete picture of the Study Area, the report should also note the other potential releases or release sources of MTBE in this vicinity, and in the area generally. These include the septic system leach field at 112 Bridge Road and the reported former gasoline storage and dispensing system at the marina at 4 Harper's Landing Drive.

3. The final report should distinguish between releases with significant investigation and remediation versus releases with limited or no investigation and remediation.

After listing certain release locations in the Study Area, section 1.1 of the draft report states briefly that "limited remedial activities may have been conducted" at these locations, and that "additional investigation/remediation work may still be necessary." To Mercury's knowledge, this is accurate as to the other release areas noted in the report, but it is significant inaccurate and incomplete as to the 1598 Saybrook Road (Tylerville Mobil) site. The site has been the subject of several years of intensive

<https://apexcos.sharepoint.com/sites/SouthWindsorCT/Shared Documents/CLIENTS/Mercury Fuel/5684-014 Mercury Fuel Haddam/Correspondence/2017/AECOM draft report - comments to CTDEEP.DOCX>



investigation, utilizing approximately 34 monitoring wells on or in the vicinity of the site, and remediation via air sparging and soil vapor extraction. These efforts have been successful. Since 2014, DEEP has approved discontinuance of monitoring at all but 8 monitoring wells on or immediately adjacent to the site. In the most recent sampling round, MTBE was detected in only 5 of these monitoring wells, and in all cases below CTDEEP-established Remediation Standard Regulations numeric criteria. Monitoring is continuing to ensure that the residual contamination plume remains stable and groundwater quality continues to be below RSR numeric criteria.

4. The final report should clearly distinguish between historic conditions no longer present (particularly regarding MTBE impacts at the western edge of the Study Area) versus the current environmental conditions (particularly regarding ongoing or increasing impacts of other substances elsewhere in the Study Area).

As noted above, **historic MTBE impacts at the western edge of the Study Area have greatly diminished or are no longer present.** The source area identified at 1598 Saybrook Road has been successfully abated. Residual MTBE impacts are limited in scope and scale, and continue to be monitored to ensure continued attenuation. This is demonstrated by the monitoring data in Appendix B to the draft report. However, the text of the draft report and various graphic depictions in the Figures fail to distinguish historic from current conditions (e.g., the MTBE color-coding of various Saybrook Road/Bridge Roads lots on the map at Figure 2 and 3). This creates the impression of a continuing issue across several properties that needs resolution. This is not supported by the data, and should be corrected.

Equally importantly, **none of the Saybrook Road/Bridge Road potable wells still monitored by Mercury remain above CTDPH action levels for any petroleum constituents.** As noted above, several years ago CTDEEP requested that Mercury perform sampling of up to 19 potable wells due to MTBE impact at the western edge of the Study Area, and Mercury voluntarily agreed to perform the sampling as a demonstration of good-faith cooperation and with no admission of liability. It is important to note that some of these potable wells are located at properties where releases of MTBE were previously documented. In 2014 and 2016, based on years of monitoring data showing no MTBE or other gasoline constituent impacts in several wells, CTDEEP approved removing these wells from the monitoring program. Of the 8 potable wells still remaining the monitoring program, none have MTBE or other gasoline constituents above CTDPH action levels. Again, this is demonstrated by the monitoring data in Appendix B to the draft report, but is not reflected in the draft report text and color-coded maps.

In addition, for the 5 potable wells monitored that are equipped with a GAC water treatment system, monitoring demonstrates that these systems have been 100% effective: over the several years of the monitoring program, there has been no indication of breakthrough of MTBE or other petroleum constituents.

Therefore, the final report should clarify that the decision to construct a public drinking water line to Tylerville is driven by environmental conditions in the Study Area other than residual MTBE impacts at the western edge.

5. The final report should clearly distinguish between the cost of continuing to maintain already-installed individual water treatment systems for declining residual MTBE impacts at the western edge of the Study Area versus costs of new individual water treatment systems for other substances in other parts of the Study Area.

The draft report's discussion of the option of individual water treatment systems and monitoring seems to amalgamate costs for all existing or potential future such systems across the Study Area. However,

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the limited and decreasing residual presence of MTBE at the western edge of the Study Area, as noted above, indicates that the need for such treatment systems and monitoring there will likewise be limited and decreasing in the future.

The draft report also states that in the absence of inspection of existing individual treatment systems, the draft report assumes that all existing individual treatment systems would be replaced (sec. 5.1.2/p. 5-3). This is not appropriate as to those systems that Mercury continues to support, most of which were installed within the past several years.

The draft report also suggests that granular activated carbon (GAC) treatment systems have uncertain effectiveness against MTBE, particularly due to potential interference effects from chlorinated VOCs and/or 1,4-dioxane. As noted above, there has been no indication of breakthrough of MTBE in any of the GACs supported by Mercury at the western edge of the Study Area over several years of use. While the draft report indicates that these other substances present an issue elsewhere in the Study Area, there is no basis shown for undercutting the value of the GAC usage for the remaining MTBE impacts in the western edge of the Study Area.

This highlights that consideration of public drinking water supply options and the proposed decision to extend a public water line to Tylerville are driven by issues other than the residual or now-past MTBE impacts in the western edge of the Study Area.

In summary, Mercury appreciates the time and attention that DEEP has devoted to a persistent and apparently in some respects expanding drinking water quality issues in the Tylerville Study Area. However, these issues are essentially distinct from the limited, decreasing or resolved issues concerning MTBE at the western edge of the Study Area. The text and attachments to the final report should clarify this throughout, and that the decision to construct a public drinking water line to Tylerville is driven by other environmental conditions.

Thank you for your consideration of these comments. If any questions, please feel free to contact me.

Very truly yours,  
APEX ENVIRONMENTAL



David Sherman, LEP, LSP  
Program Manager

Attachments

cc: Michael Devino, Jr.  
Brian Freeman, Esq.



## **Response**

*Thank you for your comments. The following responses are offered to the numbered comments:*

- 1. The reference to Mercury's monitoring of nearby drinking water wells will be corrected to indicate voluntary involvement.*
- 2. Multiple documented release areas are noted in the Tylerville Center Water Supply Alternatives Evaluation Report. This Report is not a comprehensive Phase I/II Environmental Site Assessment. CT DEEP is currently preparing a more comprehensive report to evaluate known and possible sources of contamination to groundwater in the Study Area.*
- 3. An updated summary of investigation and (where applicable) remediation activities are summarized in the Report.*
- 4. Comments have been noted. This Report is not a comprehensive Phase I/II Environmental Site Assessment. CT DEEP is currently preparing a more comprehensive report to evaluate contamination to groundwater in the Study Area.*
- 5. Cost estimates associated with evaluation of water supply alternatives were prepared to be conservative. Rather than evaluating the possibility of continued use of in-place individual water treatment systems at select properties, it was determined to be more prudent and conservative to assume that all properties within the Study Area would receive new treatment systems.*

## **Comment**

Please see the attached State of Connecticut Office of Policy and Management July 10, 2017 correspondence.



STATE OF CONNECTICUT  
OFFICE OF POLICY AND MANAGEMENT  
Division of Transportation, Conservation, and Development Policy and Planning

July 10, 2017

Shannon Pociu  
DEEP, Remediation Division  
79 Elm St  
Hartford, CT 06106

Re: Notice of Scoping for the Tylerville (Haddam) Water Main Extension

Dear Shannon:

The Office of Policy and Management (OPM) has reviewed the Notice of Scoping for the Tylerville (Haddam) Water Main Extension and submits the following comments:

- The Scoping Notice says:

*DEEP has determined that the 8-inch minimum pipe size is the preferred alternative to provide a reliable, long-term source of potable water to the area...*

It is OPM's understanding that an 8" main has been determined to be adequate to provide water to the contaminated and at-risk properties. OPM believes that an 8" main is consistent with the State C&D Plan, since it will serve the stated need while minimizing the risk of inducing development across a broader area. Given the modest level of water use in the area to be served, furthermore, installation of a larger diameter main could increase the risk of public exposure to water disinfection byproducts, due to the longer period of time water would spend traveling through a larger pipe.

- The [Proposed Water Main Parcels Map](#) provided with the scoping notice classifies the proposed water main as a distribution main beginning at the Rt 82 – Rt 154 intersection and extending into Tylerville. Doing so implies that water would be available to several parcels outside the study area shown in [Figure 2 of the draft Tylerville Water Supply Alternatives Evaluation report](#).

Given that those parcels do not appear to have been identified as contaminated or at-risk properties, OPM believes the section of main passing them should be identified as transmission main comparable to the length of main further south. If, in the future, a local health department, DPH, and/or DEEP determines that a property along the route of the transmission main must be connected to that main to correct a public health problem existing on that property, such a connection should be authorized at that time. Fire hydrants would also be appropriate along the transmission main if the town chooses to install them.

Thank you for the opportunity to respond to this Notice of Scoping and please feel free to contact me if you have any questions.

Sincerely:



Bruce Wittchen  
Office of Policy & Management  
450 Capitol Ave, MS# 54ORG  
Hartford, CT 06106  
(860) 418-6323  
[bruce.wittchen@ct.gov](mailto:bruce.wittchen@ct.gov)

**Response**

*Thank you for your comments.*

**Comment**

Jackie Gardell

1. Install a homeowner water shut off for houses without basements.
2. Use a western line assignment for the water main near 110 Little Meadow Road to protect the trees and roots along the road on this property closest to the Connecticut River.

Sincerely, Jackie Gardell

110 Little Meadow Rd

Mailing address 81 Clarence Court

Middletown, CT 06457

**Response**

*Thank you for your comments. The following responses are offered to the numbered comments:*

1. *Necessary shut-off valves will be included in the design documents.*
2. *The final routing and consideration for the protection of trees will be addressed during the final design process.*

**Comment**

ED VESELAK - Subject: Tylerville drinking water - July 8, 2017

On June 21, 2017, I attended the public hearing on the Tylerville drinking water issue and wish to make the following comments in support of the proposed water line extension from Chester to Tylerville.

As the owner of a business at 1618 Saybrook Road, Haddam, I found out that there was a problem with the water being polluted in the mid- 1990s and ended up putting in a water purification system to make the water potable. There has been a ongoing battle to correct this issue and adding city water will rectify the situation permanently. Also, it would make more

opportunities for different businesses since there will no longer be a concern over the mixing of well water and septic systems.

This will make the community a better place to work and live, Also make property more valuable. I'm 100 % in support of this plan to bringing the water line to Tylerville under the public roads and then to the private sectors, as I have done I n the past and I do in the future.

I would to thank the state DEEP, DPH , state reps and town selectwoman, all others who have work hard over the years to resolving this issue make it appositive outcome for all involved to this plaguing problem.

Edward Veselak, Member Veselak LLC

1618 Saybrook Road Haddam,Conn

**Response**

*Thank you for your comments.*

**Comment**

Please see the attached correspondence from Camp Bethel.



## Camp Bethel

*Helping strengthen churches in Connecticut and beyond since 1878*

124 Camp Bethel Road, Haddam, Connecticut 06438

To: Shanon Pociu  
CT DEEP  
Bureau of Water Protection and Land Use, Remediation Division  
79 Elm Street  
Hartford, CT 06106  
RE: Public Comment: Water Supply for Tylerville

Dear Shanon,

Camp Bethel is a non-profit Christian campground that has occupied land in Tylerville for 141 years. In addition to supporting its own programs, the Camp Bethel Association rents its facilities to other groups and uses a considerable volume of water from its two drilled wells on its property. The quality and quantity of its water supply is very important to the Association. It has a long history of cooperating with the State's Departments of Public Health and Energy and Environmental Protection and has a routine semi-annual water testing program. The results of this testing has never documented contamination by any of the chemicals that have been identified as problems with the Tylerville groundwater pollution problem. This is important to stress because during the recent public meeting in Haddam, a neighbor erroneously stated that such contamination had been documented at Camp Bethel. It has not.

As a long-term part of the Tylerville community, the membership of the Association has been very concerned for the well-being of our neighbors whose wells have been affected by the pollution. Representatives from the Association attended the recent public meeting and have reported back to the Association. The Association appreciates the work done by the DEEP, the DPH, and the consultant and supports the recommended option of extending a Connecticut Water Company waterline from Chester north to Tylerville to provide good quality water to the residents. We also support the installation of fire hydrants in the village as a means of enhanced public safety.

A number of officials have told us that Camp Bethel would not be mandated to hook up to the water distribution system if it chooses not to do so. This is an important feature of this plan to the Association. At this time, the Association would exercise this right not to make a connection to the system since our water supply currently has high quality and quantity. To connect and use Connecticut Water Company water would be an unnecessary financial burden on the campground. We will continue to perform rigorous water testing at both of our wells and if the results ever detect contamination, we will then pursue connection.

We appreciate the opportunity to provide comments.

Sincerely,

Connie Schenenga  
President

### Response

*Thank you for your comments. The position with regard to connection to the proposed water main extension is noted. While we highly encourage connection to the water main, this connection will not be required. Although, please note, the State of Connecticut plans to discontinue the groundwater treatment and monitoring program following installation of the water main extension. Costs associated with future connection to the Connecticut Water Company system water main will not be reimbursed by*

*the State of Connecticut and will become the responsibility of individual property owners if they choose to connect to the water main in the future.*