

**To:** Eric McPhee, Department of Public Health, Drinking Water Section  
410 Capitol Avenue, MS #12DWS, Hartford CT 06134-0308

**From:** Linda Brunza- Environmental Analyst

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**Date:** 6/8/2018

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**Subject:** Scoping Notice for the Town of East Lyme, proposed improvements to the existing greensand filtration system

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The Department of Energy and Environmental Protection (DEEP) has received the Notice of Scoping for the project proposed by the Department of Public Health (DPH) for the Town of East Lyme to receive assistance under the Drinking Water State Revolving Fund program. The proposed project would improve the existing greensand filtration system at Well 6 Water Treatment Plant (WTP) and construct a raw water main from Well 1A to the improved Well 6. Approximately 1,400 linear feet of new 12” diameter ductile iron main will be installed to convey the raw water from Well 1A to the Well 6 WTP where it can be treated for iron and manganese removal. Improvements to Well 6 WTP will include accommodating the additional flow from Well 1A and a building addition next to the existing WTP for new treatment equipment and storage. The following comments are submitted for your consideration.

#### **Water Treatment Wastewater Discharges**

Town of East Lyme will be required to modify the information in their registration under the Miscellaneous General Permit for the increase in the daily water treatment wastewater discharge that will likely result from this project. Information regarding permit modification is in section 4(e) of the [Miscellaneous General Permit](#). Questions can be directed to Don Gonyea, 860-424-3827, [donald.gonyea@ct.gov](mailto:donald.gonyea@ct.gov); or Jim Creighton, 860-424-3681, [james.creighton@ct.gov](mailto:james.creighton@ct.gov).

#### **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 Surface Water and Groundwater (Comprehensive General Permit). No registration is required under the Comprehensive General Permit for this discharge but East Lyme must comply with operating conditions and effluent limits of the Comprehensive General Permit. Questions can be directed to Don Gonyea, 860-424-3827, [donald.gonyea@ct.gov](mailto:donald.gonyea@ct.gov); or Jim Creighton, 860-424-368, [james.creighton@ct.gov](mailto:james.creighton@ct.gov).

#### **Water Diversion**

The proposed water main extension would not require a permit from the Water Planning and Management Division for the diversion of waters of the State pursuant to section 22a-368 of the Connecticut General Statutes (CGS) provided it meets the exemption criterion of section 22a-

377(b)-1(a)(5) of the Regulations of Connecticut State Agencies (RCSA). For more information contact 860-424-3704 or online at [Water Diversion Program](#).

### **Aquifer Protection**

The proposed project for Well 1A Raw Water Main and Well 6 WTP are located in an Aquifer Protection Area. Best Management Practices should be utilized during construction within this area. 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](http://www.ct.gov/deep/aquiferprotection), in the Appendices section.

Best Management Practices 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

For further information regarding the program and its regulatory requirements, contact the Bureau of Water Protection & Land Reuse at 860-424-3020. The State Aquifer Protection Land Use Regulations can be downloaded at: [Aquifer Protection Regulations](#).

### **404/ 401 Water Quality Certification**

It is unknown whether the main 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](#).

### **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 & 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](#).

### **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:

Robert Hannon, DEEP/ Office of Planning and Programming

Donald Gonyea, DEEP/ Water Permitting and Enforcement Division

Doug Hoskins, DEEP/ Water Planning and Management Division

Kim Czapla, DEEP/ Land and Water Resources Division

Michael Grzywinski, DEEP/ Land and Water Resources Division

Louis Corsino, DEEP/ Planning and Standards Division, Air Bureau Mobile Source Group