MEMORANDUM

To: Sarah Ramsbottom, Eric McPhee, Connecticut Department of Public Health (CT-DPH)

From: Scott Bonett, Ashley Hogan, Connecticut Water Company (CTWC)

Date: 10/3/24

Re: Response to DEEP Scoping Review
Connecticut Water Green Springs System

Introduction and Purpose of Memorandum

Connecticut Water Company intends to interconnect the Green Springs public water system (Green Springs) with the CTWC Shoreline Region Guilford public water system by constructing a 6,500 linear foot water main between the two systems. This project is intended to mitigate per- and polyfluoroalkyl substance (PFAS) contamination present in the Green Springs wells. The project will be financed through the CT-DPH State Revolving Fund Program. As such, the project has been submitted for environmental scoping review by the Connecticut Department of Energy and Environmental Protection (CT-DEEP) per the requirements of the Connecticut Environmental Policy Act. This memorandum serves to provide a response to CT-DEEP Scooping Comments

Response to Comments

CT-DPH provided CT-DEEP Scoping comments to CTWC on September 19, 2024. CTWC has listed the provided comments below. CTWC's responses to CT-DEEP comments are provided in ***bold italic***.

1. Effect on water quality, including surface water and groundwater.
Melissa Mostowy, Water Planning and Management Division, Melissa.Mostowy@ct.gov:
This project would be exempt from Consumptive Water Diversion permitting requirements. The proposed public water supply interconnection is taking place within the same public water supply service area, in this case an "Exclusive Service Area" assigned to the Connecticut Water Company, and as such would be exempt pursuant to Sec. 22a-377(b)-1(a)(5) of the Regulations of Connecticut State Agencies (RCSA). Additionally, transfers through the interconnection would not likely exceed 50,000 gallons per day, therefore qualifying for exemption under Sec. 22a-377(b)-1(a)(6) RCSA.
Connecticut Water is in agreement.

Melissa Fahnestock, Water Planning and Management Division, Melissa.Fahnestock@ct.gov:
portal.ct.gov/DEEP

The proposed construction site is not located in an Aquifer Protection Area, a parcel prioritized for source water protection as shown on the Parcel Prioritization for Source Water Protection Viewer, or in an area of coarse-grained deposits as shown on the CT Surficial Aquifer Potential Map. This area is not a current source and is not a likely future source for groundwater. There are no concerns related to the Aquifer Protection Area Program.
Connecticut Water is in agreement.

Marlene Krajewski, Water Planning and Management Division, Marlene.Krajewski@ct.gov:
The proposed project site project crosses two subregional watersheds, the Hammonasset River and Neck River watersheds, both within the same regional watershed. Therefore, this connection will result in interbasin transfer; proper measures should be taken to ensure that this transfer does not result in a disproportionate strain on either of the two watersheds as a result of any transfer of water between the two.
The average day demand for the Green Springs system is 5,000 gallons per day, and this small transfer volume will not put a disproportionate strain on either watershed.

2. Effect on flooding, in-stream flows, erosion, or sedimentation.
Susan Jacobson, Susan.jacobson@ct.gov:
Flood Management Certification: - If proposed activities are being funded or conducted by a state agency AND are being conducted within a FEMA designated floodplain, the applicant should consult with the DEEP's Land and Water Resources Division for information on how to comply with the States Flood Management Statutes and Regulations. For information on identifying if the site is in a flood zone, please see FEMA's website: FEMA Flood Map Service Center. For information on Flood Management Certification, please see DEEP's website: Flood Management Certification Fact Sheet.
Connecticut Water has had a pre-application meeting with DEEP and they determined that we do not need a Flood Management Certification.

3. Effect on natural communities and upon critical plant and animal species and their habitat; interference with the movement of any resident or migratory fish or wildlife species.
Bruce Williams, Fisheries Division HCE Program, Bruce.Williams@ct.gov:
Any unconfined in-water work occurring in Oil Mill Brook or Huzzle Guzzle Brook should be restricted to the period from June 1 to September 30, inclusive of those dates. Confined in-water work (e.g. behind cofferdams) is permissible at any time of year, but downstream flows must be maintained at all times.
There will be no in-water work included in this project.

4. Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to cause unreasonable adverse effects on the environment.
No comments at this time.

5. A substantial increase in the type or rate of energy use as a direct or indirect result of the action.
portal.ct.gov/DEEP
No comments at this time.

6. Effect on air quality.
No comments at this time.

7. Effect on existing land resources and landscapes, including coastal and inland wetlands.
Danielle Missell, Land and Water Resources Division, Danielle.Misselll@ct.gov:
It looks like the project might cross some watercourses. If fill is placed within a wetland or watercourse the applicant should contact the LWRD for possible permitting requirements.
There will be no fill placed within a wetland or watercourse.

8. Adequacy of existing or proposed utilities and infrastructure.
No comments at this time.

9. Effect on greenhouse gas emissions as a direct or indirect result of the action.
No comments at this time.

10. Effect of a changing climate on the action, including any resiliency measures incorporated into the action.
No comments at this time.

11. Additional Comments/ Concerns:
Allison Forrest-Laiuppa, ERSPD, Allison.forrest-laiuppa@ct.gov:
Based on the nature of the historical releases and the remedial actions taken for the PCB release, there are no concerns remaining associated with these PCB releases.
Connecticut Water is in agreement.

List of permits:
Federal Section 404 Clean Water Act, Inland, Water Quality Certification (WQC)
☐ Required for this project.
☒ Based on the information provided, it cannot be determined if fill is proposed in Waters of the U.S. A state and federal wetland delineation will be required if fill is proposed in Waters of the U.S. Wetlands and Watercourses should be clearly field delineated by a qualified soil scientist. If work is being proposed in a wetland or watercourse (crossings, fill, structures, culverts etc.), contact the Army Corps of Engineers to determine if it is within their jurisdiction.
☐ Not required. **portal.ct.gov/DEEP**
The Project does not propose fill in any waterway, and as such will not require an associated permit.

State 401 Water Quality Permit
☐ Required. (if a federal 404 WQC is required, a state 401 is also required because the programs are tied together)
☒ Based on the information provided, it cannot be determined if fill is proposed in Waters of the U.S. A state and federal wetland delineation will be required if fill is proposed in Waters of the U.S. For a pre-application meeting, contact: Susan.jacobson@ct.gov (for projects in towns that are west of the CT River) or Darcy.winther@ct.gov (for projects in towns that are on the CT River or east of the river).
☐ Not required.
The Project does not propose fill in any waterway, and as such will not require an associated permit.

General Permit for Stormwater and Dewatering Wastewaters from Construction Activities (Construction Stormwater GP). Note: Without detailed plans, several options might be checked, please review these options to determine which is applicable for the project.

☐ If between one and five acres of disturbance and approved at the local level, not required to register with DEEP.

☐ If five or more acres of disturbance and approved at the local level, must complete registration form and Stormwater Pollution Control Pan to DEEP at least 60 days prior to the initiation of construction. Registrations shall include a certification by the 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. In addition to measures such as erosion and sediment controls and post-construction stormwater management, the SWPCP must include a schedule for plan implementation and routine inspections. For further information, contact the division at 860-424-3025 or DEEP.StormwaterStaff@ct.gov

☐ Projects exempt from local permitting (conducted by government authorities) disturbing over one acre must submit a registration form and Stormwater Pollution Control Plan to DEEP at least 60-90 days, as identified by the permit, prior to initiating construction.

The Construction Stormwater General Permit registrations must be filed electronically through DEEP's ezFile Portal. Additional information can be found online at: Construction Stormwater GP.

Registration will not be required because construction will be disturbing less than one acre of land.

CTWC appreciates the review time spent by CT-DEEP and we hope that this memorandum addresses all comments adequately. If there are questions or additional information is needed, please contact Scott Bonett, CTWC, at 860-944-2378 or Scott.Bonett@ctwater.com