

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

Date:	October 20, 2020	Staff Contact:	Eric McPhee
Applicant PWS Name:	Groton Utilities	Town:	Ledyard and Preston
PWSID:	CT0950011		
Project Name:	Emergency Interconnection between Norwich Public Utilities, Ledyard WPCA and Town of Preston		
Funding Source:	Groton Utilities		
State Funds:	N/A		

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 City of Groton (City) is receiving financial assistance from the Drinking Water State Revolving Fund (DWSRF) program for the Groton Utilities (GU) Water Treatment Plant (WTP) Upgrade project. The proposed emergency interconnection between Norwich Public Utilities (NPU) and Ledyard Water Pollution Control Authority (WPCA) is associated with WTP Upgrade project as it will enable GU to wheel water through the Ledyard WPCA distribution main to provide water supply to the NPU distribution system serving certain service areas of the Town of Preston, if needed in a public drinking water supply emergency pursuant to CGS section 25-32b (i.e. state-declared water supply emergency). This emergency interconnection project is essential to provide NPU with the ability to provide continuous water service to their customers in the Town of Preston in the event of an emergency. Although this emergency interconnection project is not receiving funding from the DWSRF program, it was scoped due to its association with state grant funding that the City received for the GU WTP project.

The project comprises installation of new 16-inch diameter ductile iron water pipes totaling approximately 1224 lineal feet and associated appurtenances along Poquetanuck Cove Bridge between Ledyard and Preston in CT. The water mains have been minimally sized to meet the demands for domestic water use for the intended service areas and fire protection per the Town's Fire Marshal requirement.

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 – DEEP Comment, **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.

GU's Response: Groton Utilities equipment is furnished with necessary emission controls to meet DEEP's guidelines where applicable. Equipment operators will be briefed on the State of Connecticut's regulation regarding excessive idling.

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.

GU acknowledges this comment.

- b. **Water Quality – DEEP Comment:** 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 the applicant must comply with the operating conditions and effluent limits of the Comprehensive General Permit. 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 Don Gonyea, 860-424-3827, douald.gonyea@ct.gov; or Jim Creighton, 860-424-368, james.creighton@ct.gov.

Groton Utilities' Response: Following completion of the water main installation, the water main will be pressure and leakage tested in accordance with the appropriate ASI/AWWA C600 and C651-05, respectively. Prior to discharging the spent water into the environment, it will be de-chlorinated by discharging the water into a pool with de-chlorination tablets. In addition, GU recently sent in the DEEP's latest General Permit Registration form and is aware of the terms and conditions required for this testing procedure.

- 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 proposed project is intended to provide water supply resiliency for the customers of NPU, the Ledyard WPCA and the Town of Preston.
 - b. **Water Diversion- DEEP Comment:** The definition of emergency as applied in this project will need to be clarified in the post-scoping notice or the Environmental Impact Evaluation. Section 22a-277(5) of the Connecticut General Statutes (CGS) exempts from permit requirement

diversions for “fire emergency purposes,” and section 22a-378 of the CGS allows for diversions in response to a state-declared water supply emergency. If neither of these emergency exemptions are applicable, then a permit will be needed for an interconnection between distribution systems or service areas in excess of 50,000 gallons per day in compliance with section 22a-377(b)-1(a) of the Regulations of Connecticut State Agencies (RCSA). For more information, contact the Water and Planning Management Division at 860-424-3704 or online at Water Diversion Program.

GU’s Response: The Emergency Supply Agreement executed by the City of Groton, the Town of Ledyard and the Town of Preston identifies the provision of water during a public drinking water supply emergency pursuant to CGS Section 25-32b (i.e. state-declared water supply emergency).

- c. Groundwater – The proposed project is not expected to cause significant impacts to groundwater.
- d. Flooding – DEEP comment: A Flood Management Certification from DEEP is required with any state funded activity within or over a FEMA designated floodplain, as in the case with a bridge crossing. Because this project is a state action, it must be certified by the sponsoring agency as being in compliance with flood and stormwater management standards specified in section 25-68d of the CGS and section 25-68h-1 through 25-68h-3 of the RCSA and receive approval from DEEP. For further information, contact the Land and Water Resources Division at 860-424-3706.

GU’s Response: GU agreed to undertake this interconnection project using its own funds without any state funding assistance to help secure state grant funding to cover the cost, in part for its Water Treatment Plant improvement project which is undergoing complete rehabilitation and is receiving state grant-in-aid and loan assistance from the Drinking Water State Revolving Fund Program (DWSRF) of the Department of Public Health (DPH). The DPH required GU to scope the project since it was indirectly associated with the grant funding GU received for the treatment plant improvement project. Per email correspondence from Stacy Pappano of the DEEP, the interconnection work is not related to the DWSRF treatment plant contract. The proposed work does not involve State Land or State funding and therefore does not fall within the regulatory Flood Management Certification requirements.

- e. Erosion or Sedimentation – DEEP Comment, 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.

GU's Response: Groton Utilities will use Best Management Practices to reduce any impacts from stormwater discharge during construction.

3. Effect on natural land resources and formations, including coastal and inland wetlands, and the maintenance of in-stream flows – DEEP comment: The construction methods and exact locations for water pipe installation are currently unknown. DEEP recommends 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. Any regulated areas identified by the soil scientist 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.

GU's Response: The water main will be installed along the Poquetanuck Cove bridge. A small portion of the main will be installed on the Road at both ends of the bridge connecting the existing distribution mains located in the Town of Preston and the Town of Ledyard.

4. Disruption or alteration of an historic, archeological, cultural or recreational building, object, district, site or surroundings - The proposed project is not expected to cause negative impacts.
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 – According to the DEEP Natural Diversity Database records, the State Endangered plant Seaside crowfoot (*Ranunculus cymbalaria*) and State Special Concern Lilaepsis (*Lilaeopsis chinensis*) grow along the shoreline of Poquetanuck Cove and adjacent to the proposed project area: Based on the information and the footprint provided, work will be conducted along the Route 12 roadway and bridge with no work in wetlands or watercourses and no direct impacts to the Thames River. A map of the known plant locations that occur adjacent to the project area was provided. To prevent impacts to state listed plants no work shall occur in any mapped plant areas or suitable habitat including no staging or storage of equipment or materials.
6. Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to create extensive detrimental environmental impact – The proposed project is not expected to cause negative impacts.
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 proposed project is consistent with Policy 2 of Growth Management Principle #5: “**IDENTIFY** water supply resources sufficient to meet existing demand, to mitigate shortages during drought, and to meet projected growth and economic development over at least the next 50 years.” This project will enable GU to wheel water through the Ledyard WPCA distribution main to provide water supply to the NPU distribution system serving certain service areas of the Town of Preston, if needed in a public drinking water supply emergency pursuant to CGS section 25-32b. This emergency interconnection project is essential to provide NPU with the ability to provide continuous water service to their customers in the Town of Preston in the event of an emergency.

9. Disruption or division of an established community or inconsistency with adopted municipal or regional plans-The proposed project is consistent with the “Regional Water Priority Planning Document” endorsed by the Southeastern Connecticut Council of Governments on November 17, 2010 which identifies the subject emergency interconnection as a Mid-term/Medium Priority project.
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 – No significant impact expected.
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 the proposed project which includes a review of the comments provided by the DEEP dated June 21, 2019, and response provided by Groton Utilities dated September 24, 2020, 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 Groton Utilities, Norwich Public Utilities, Ledyard WPCA and the Town of Preston to ensure that the recommendations by the DEEP are implemented.