



To: Eric McPhee, Department of Public Health  
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Date: 2/15/2024

Subject: Scoping Notice for Nathan Hale System Main Extension to Plains Road,  
Coventry

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The Department of Energy and Environmental Protection (DEEP) has received the Notice of Scoping for the Nathan Hale System Main Extension project sponsored by the Department of Public Health. The project is located at South Street Extension in Coventry, from approximately the intersection of Upton Drive to Plains Road. The project consists of installing a water main extension to serve five single family residences, which are currently served by private wells that are experiencing polluted groundwater. This will be accomplished by extending a total of 5,015 linear feet of 6-inch water main, from the existing Nathan Hale System of the Connecticut Water Company.

The following comments are submitted for your consideration. There will be information linked to DEEP's website as well as contact information for the programs.

The **Permitting/ Regulatory Programs** section contains information on DEEP's regulatory programs that may require permits for the project or may be supplementary information, needed in order to complete a permit application (such as the Natural Diversity Database program and Fisheries Division). The links and contact are there to help guide the applicant and sponsoring agency to determine if permits are required after the project moves closer to design and construction. These comments are meant to provide a high-level analysis of the area, since scoping notices tend to be at the beginning stages of a project.

The **Information/ Best Management Practices** section contains comments that may need to be addressed in the post-scoping notice or Environmental Impact Evaluation.

## Permitting/ Regulatory Programs

### **Remediation**

Contact: Veronica Tanguay, Remediation Division, [Veronica.Tanguay@ct.gov](mailto:Veronica.Tanguay@ct.gov)

The DEEP Remediation Division supports the extension of the Nathan Hale System water main extension to the Plains Road neighborhood as a means to provide a long-term source of drinking water to properties impacted by road salt contamination, pursuant to Connecticut General Statute (CGS) 22a-471.

Since 2019, the DEEP Remediation Division has been working with the Town of Coventry to investigate and develop corrective actions to address impacts from road salt that have resulted in contamination of the bedrock aquifer that serves as the source of drinking water to the Plains Road neighborhood. The extension of the Nathan Hale System water main would satisfy the Town of Coventry's obligations under CGS 22a-471.

Based on the purpose of the project to provide safe drinking water to residents and the distance from any known remediation site (the closed Coventry Landfill is located over 2,000 feet away from the project site), the expected impact on human health and environment will be minimal during the water main extension construction.

### **Consumptive Water Diversion**

Contact: Melissa Mostowy, Water Planning and Management Division, [Melissa.Mostowy@ct.gov](mailto:Melissa.Mostowy@ct.gov)

DEEP staff have reviewed the project to determine if a consumptive diversion permit is needed. Based on the review it has been determined that a permit is not needed, as it is unlikely that the increased demand will cause the system to exceed 50,000 gallons per day.

### **Natural Diversity Database**

Contact: Robin Blum, Wildlife Division, [Robin.Blum@ct.gov](mailto:Robin.Blum@ct.gov)

DEEP staff have reviewed NDDDB mapping and found that the project site is not within an NDDDB area, and have no further comments on the project.

The Natural Diversity Database (NDDDB) Request for Review process was developed by DEEP to assist state agencies with the requirement that any activity authorized, funded, or performed by the state does not threaten the existence of endangered or threatened species. Applicants for state and local permits and grants may be required to consult with the NDDDB as part of the application process. Species and habitat surveys may be required in order to assess risks and to determine appropriate mitigation measures.

[Maps](#) are available as a pre-screening tool to help determine if there could be an impact to known locations of state-listed species. Shaded areas ("blobs") on the maps show approximate locations of state-listed and federal-listed species and important natural communities. When viewing the NDDDB maps, please consider the entire area affected by a project, including any potential runoff or other disturbance. Locations outside of the mapped areas are not necessarily free of listed species; these locations may not have been surveyed and there may be potential impacts from disturbance in these locations. If a project falls within a shaded area, the applicant must submit a [Request for NDDDB State-listed Species Review](#), please review [Instructions for Creating a New Account](#) located on the DEEP NDDDB website.

### **Stormwater and Dewatering Wastewaters from Construction Activities General Permit**

Contact: Water Permitting and Enforcement Division, [DEEP.stormwaterstaff@ct.gov](mailto:DEEP.stormwaterstaff@ct.gov)

The General Permit for [Stormwater and Dewatering Wastewaters from Construction Activities](#) may be applicable depending on the size of the disturbance regardless of phasing. This general permit was created to address rainfall runoff (i.e., stormwater) from sites under construction in order to reduce or eliminate the discharge of sediment from the site during construction as well as addressing discharges of other stormwater pollutants from the site long term.

The construction stormwater general permit dictates separate compliance procedures for Locally Exempt projects (projects primarily conducted by government authorities) and Locally Approvable projects (projects primarily by private developers). This general permit applies to discharges of stormwater and dewatering wastewater from construction activities where the activity disturbs more than an acre. The requirements of the current general permit include registration to obtain permit coverage and development and implementation of a Stormwater Pollution Control Plan (SWPCP). The SWPCP contains requirements for the permittee to describe and manage their construction activity, including implementing erosion and sediment control measures as well as other control measures to reduce or eliminate the potential for the discharge of stormwater runoff pollutants (suspended solids and floatables such as oil and grease, trash, etc.) both during and after construction. A goal of 80 percent removal of the annual sediment load from the stormwater discharge shall be used in designing and installing post-construction stormwater management measures. Stormwater treatment systems must be designed to comply with the post-construction stormwater management performance requirements of the permit. These include post-construction performance standards requiring retention and/or infiltration of the runoff from the Water Quality Volume (WQV) in accordance with the Stormwater Quality Manual and incorporating control measures.

Projects that are exempt from local permitting that disturb over one acre must submit a registration form and Stormwater Pollution Control Plan (SWPCP) to the Department at least 60 or 90 days, as identified in the permit, prior to the initiation of construction. 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 and SWPCP to the Department 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. The construction stormwater general permit registrations must be filed electronically through DEEP's [ezFile Portal](#). Additional information can be found on-line at: [Construction Stormwater GP](#).

### **Information/ Best Management Practices**

#### **Aquifer Protection**

Contact: Melissa Fahnestock, Water Planning and Management Division, [Melissa.Fahnestock@ct.gov](mailto:Melissa.Fahnestock@ct.gov)

DEEP staff have reviewed the location of this project and found that it is not in an aquifer protection area, and have no further comments on the project.

#### **Watershed Management**

Contact: Emma Coffey, Water Planning and Management Division, [Emma.Coffey@ct.gov](mailto:Emma.Coffey@ct.gov)

Two subregional watersheds merge at the proposed project area for the water main extension installation. The project area is set to span from approximately Upton Drive (Mill Brook Subregional Watershed) to Plains Road (Willimantic River Subregional Watershed). As such, the applicant should consider that there may be some transfer of water between these subregional watersheds. The quantity of water in the potential water transfer is expected to be negligible.

A large freshwater forest and shrub wetland lies between the proposed project area, and spans both north and south of South Street Extension. Any construction of the water main extension should consider erosion and sediment control best management practices to reduce impacts caused to surrounding water resources.

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: Eric Hammerling, Office Director, DEEP/ERSI