

**To:** Eric McPhee, Department of Public Health  
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**From:** Linda Brunza- Environmental Analyst

**Telephone:** 860-424-3739

**Date:** 4/5/2021

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**Subject:** Scoping Notice for Countryside Drive Association Consolidation with Norwich Public Utilities

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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) to provide financial assistance under the Drinking Water State Revolving Fund program to Norwich Public Utilities (NPU). Funding will be used to construct a water main to consolidate the residential homes of the Countryside Drive Association public water system with NPU's distribution system. The project will also be receiving federal funding under the 2016 Water Infrastructure Improvements for the Nation Act.

As stated in the scoping notice, the proposed project will comprise the installation of approximately 1,200 linear feet of 8-inch diameter ductile iron pipe along Lawler Lane and approximately 1,400 linear feet of 4-inch diameter polyethylene pipe along Evergreen Street to serve a total of 22 residential homes. Based on the information identified in the Preliminary Engineering Report, a well, which is a sole source of water supply for CDA is in close proximity to septic systems and coliform bacteria have been detected in the well water on various occasions. Realizing that the source of supply is contaminated with coliform bacteria and that their existing infrastructure is aged, the CDA has determined that receiving water service from NPU and properly abandoning their existing water system is the best long term solution to address these issues. The new main will be installed along the edge of the road.

The following comments are submitted for your consideration.

#### **Water Diversion**

This proposal is exempt from Diversion permitting because it is unlikely that it will meet the 50,000 gpd threshold for diversion regulation, and the interconnection is taking place within the Norwich Utilities service area.

If you have any questions please contact Doug Hoskins, with the Water Planning and Management Division at [Douglas.Hoskins@ct.gov](mailto:Douglas.Hoskins@ct.gov) or 860-424-4192.

#### **Watershed Planning and Management**

DEEP would like to take this opportunity to comment that the local health department should be notified of confirmed coliform bacteria results in current drinking water. There should be some

parallel action to further assess and remedy the coliform bacteria source documented to be entering the sole source well. Abandonment does not address subsurface movement of coliform bacteria to other wells or receiving surface waters.

There is a statewide bacteria Total Maximum Daily Load (TMDL) core document from 2012 that identifies nonpoint sources of fecal indicator bacteria including insufficient septic systems. This document can be found with on DEEP's website using this link: [A Statewide Total Maximum Daily Load Analysis for Bacteria Impaired Waters](#).

With additional TMDL watershed appendices planned for the Shetucket River watershed once data becomes available, it is likely that recommended next steps will be to address known insufficient septic systems.

### **Natural Diversity Database**

The Natural Diversity Database is a record of state or federal listed species maintained by the Wildlife Division that may be found in the project area. A cursory review shows no documented occurrences of listed species.

Please be advised that should state permits be required, a formal application may need to be sent to the Wildlife Division prior to submitting permit applications for a detailed review of the species that may occur in this area, particularly near the reservoir. The applicant must submit a *Request for Natural Diversity Data Base (NDDDB) State Listed Species Review Form* (DEEP-APP-007) and all required attachments, including maps, to the NDDDB for further review. Additional information concerning NDDDB reviews and the request form may be found on-line at [NDDDB Requests](#).

### **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 Discharges to Surface Water and Groundwater* (Comprehensive General Permit). No formal registration is required under the Comprehensive General Permit for this discharge but operating conditions and effluent limits of the Comprehensive General Permit must be followed. 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, [donald.gonyea@ct.gov](mailto:donald.gonyea@ct.gov); or Jim Creighton, 860-424-3681, [james.creighton@ct.gov](mailto:james.creighton@ct.gov).

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  
Doug Hoskins, DEEP  
Robin Blum, DEEP  
James Creighton, DEEP  
Eric Thomas, DEEP