

To: Mr. Eric McPhee, Department of Public Health, Drinking Water Section
410 Capitol Avenue, MS #12DWS, PO Box 340308, Hartford CT 06134

From: Linda Brunza- Environmental Analyst

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Date: 4/14/2022

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Subject: Scoping Notice for the Emergency Interconnections Project in Cromwell, Berlin, Rocky Hill, and Middletown

The Department of Energy and Environmental Protection (DEEP) has received the Notice of Scoping for the project proposed by the Department of Public Health on behalf of the Cromwell Fire District to establish emergency interconnections to its public water system to improve resiliency.

Water Diversion

Transfers between public water supply service areas, as proposed at all four locations, in excess of 50,000 gallons per day, are regulated activities under the Water Diversion Act [22a-377(c)-1(a)(4) RCSA], unless the transfer occurs during a water supply emergency declared by the state [22a-377(a)(8)(B) CGS]. Regulated transfers of up to 1,000,000 gallons per day may be eligible for authorization under the [General Permit for Diversion of Water for Consumptive Use](#), otherwise an [Individual Water Diversion Permit](#) would be necessary. Doug Hoskins of the Consumptive [Water Diversion Program](#) may be contacted at 860-424-4192 or douglas.hoskins@ct.gov for more information.

Natural Diversity Database- Wildlife Division

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 that the location of this project falls within the boundaries of the Natural Diversity Database. Please be advised that should state or federal permits be required, a formal application must be sent to the Wildlife Division prior to submitting permit applications for a detailed review of the species that may occur in this area. The applicant must submit a *Request for Natural Diversity Data Base (NDDB) State Listed Species Review Form* (DEEP-APP-007) and all required attachments, including maps, to the NDDB for further review. Additional information concerning NDDB reviews and the request form may be found on-line at [NDDB 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 complied with. 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 Jim Creighton, 860-424-3681, james.creighton@ct.gov.

404/ 401 Water Quality Certification

For the interconnection routes, it is recommended that a certified soil scientist perform a reconnaissance of the site 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 Connecticut General Statutes (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. The project may fall under the perimeters for Self-Verification for Corps permitting. 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](#).

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/ OPPD