

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

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Date: 6/2/2020

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Subject: Huckleberry School Water Main Extension

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 funding for the connection of the Huckleberry Hill School to an existing Aquarion Water Company water main on Nabby Road. This would require 3,700 linear feet of 12-inch pipe for the connection. This project will alleviate concerns that the wells in this area are approaching Connecticut's maximum contaminant levels for chloride. The following comments are submitted for your consideration.

Water Diversion

Section 22a-377(b)-1(5) of the Regulations of Connecticut State Agencies exempts this activity regardless of the proposed volume of water to be provided given that the subject distribution main is taking place entirely within an Exclusive Service Area of the Aquarion Water Company:

*Diversion of water, or increase in the capacity to divert water, incidental to providing water treatment, **extending distribution mains**, or maintaining or expanding service **within a service area**, provided the quantity of water withdrawn from any source does not exceed the quantity authorized pursuant to any applicable permit issued or registration filed under section 22a-368 of the Connecticut General Statute.*

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

Hydrostatic Pressure Testing Wastewater Discharge

Aquarion Water Company or the construction contractor will need to conduct hydrostatic pressure testing on the new water mains to check for leaks before they are placed in service. This pressure test will produce wastewater. This wastewater falls under a category called "potable water system maintenance or sampling wastewaters" in DEEP's *General Permit for Miscellaneous Discharges of Sewer Compatible Wastewater* (Miscellaneous GP) and DEEP's *Comprehensive General Permit for Discharges to Surface Water and Groundwater* (Comprehensive GP). The Miscellaneous GP can be used if sanitary sewer is available in the area and the Comprehensive GP can be used if sanitary sewer is not available. Neither permit requires registration for the discharge

of “potable water system maintenance or sampling wastewaters” as long as certain operating conditions in the permit are followed. In the Miscellaneous GP, those conditions are located at Section 5(e)(5) on page 37. In the Comprehensive GP, those conditions are located on page 28 at Section 5(a)(3)(O) for discharges to surface water and on page 29 at Section 5(a)(3)(P) for discharges to groundwater.

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; or Jim Creighton, 860-424-3681, james.creighton@ct.gov.

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 recent NDDDB review was conducted on the Huckleberry Elementary School property and revealed a special concern plant, hairy fruited sedge, on the southeastern corner of the existing athletic fields. The athletic field may not be in the vicinity of the proposed project, but should be taken into consideration if construction extends beyond the route for the water main.

The recommended strategies to avoid or minimize potential impacts to the eastern box turtle apply to this project because the work is primarily along the road. DEEP’s Wildlife Division recommends strategies for protection, such as contractor awareness, relocation efforts to remove any turtle out of harm’s way, potential for exclusionary fencing at the limits of disturbance, and oversight during construction that the protection measures are put into practice.

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. 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](#).

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