



Town of Coventry
Office of the Town Engineer
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February 23, 2024

Lisette Stone
Environmental Engineer 2
Drinking Water Section – DWSRF Program
CT Department of Public Health

VIA EMAIL

RESPONSE TO:

- February 16, 2024, OPM Review Memo to Notice of Scoping for Nathan Hale System Main Extension to Plains Road, Coventry
- February 15, 2024, CT DEEP Review Memo to Scoping Notice for Nathan Hale System Main Extension to Plains Road, Coventry

Dear Florin,

Please find the Town's responses in **red** following the quoted memo comments *italicized*.
OPM Memo

- *The scoping notice describes the proposed project as being a 5,015-ft extension of 6-inch water main to serve five single family residences. That length of pipe could contain 7,000 gal of water and, depending on the five households' rate of water use, it could take a week for water to pass through that length of pipe, in addition to the time required for water to reach the pipe. Does the potential accumulation of disinfection by-products or loss of residual chlorine in that length of time pose a health risk to the occupants of those homes? If so, what water quality monitoring and management protocols will be in place?* **The Town and its consultant GZA have been coordinating with the CT Water Company (CWC) regarding this matter. Currently we have reduced the water main size from 8" to 6" to reduce the volume in the main. We will continue to work with CWC on the Operations & Maintenance (O & M) on this line to assure the five homes receive the water that meets the EPA and DPH drinking water standards.**
- *The proposed extension traverses areas mapped as 100-year flood zone and prime or statewide important farmland soils, areas in which the extension of infrastructure that can encourage development would not be consistent with the [State C&D Plan](#). Some previous agency-funded extensions of water mains that might have induced development of agricultural and other conservation-oriented lands in a manner inconsistent with the C&D Plan incorporated service restrictions to minimize such inconsistencies and avoid the need to evaluate them with an Environmental Impact Evaluation. Is DPH considering such restrictions to minimize potential inconsistencies with the State C&D Plan?* **The preliminary dialogue between the Town and DPH is that only these 5 households whose domestic wells are currently affected with the high Sodium and Chloride levels will be eligible to tie into the water main extension. That said, it is the Town's understanding that should additional households "adjacent" to the contaminate blume become impacted, then they will be eligible for tying into the water main line.**

- A [1/11/2024 Town Manager report](#) OPM found online says the water main extension was determined to be the best option for addressing the contaminated wells, referencing a report not included with the scoping notice. A [2023 presentation](#) also found on Coventry's website identifies some alternatives that apparently were considered prior to selecting the water main extension.

How do short and long-term costs vary among the various alternatives considered to respond to the contamination? **The Town of Coventry executed an Engineering Alternative Analysis Report dated September 7, 2023 with the assistance of its consultant GZA Geoenvironmental which outlined the different options to address the elevated sodium and chloride presence in the domestic wells. This Report was submittal to CT DPH, CT DEEP and our local health district which received concurrence the water main extension was the best solution.** The town manager report estimated the cost of the extension to be \$2.8 million, with state funding expected to cover 25-50% of that cost. DPH's online listing of community water systems says there are 40 service connections on the Nathan Hale System. Will future O&M costs for the proposed 5,015-ft extension be shared only among Nathan Hale System ratepayers or will costs be shared more broadly among other ratepayers of CT Water Co.'s Northern Region and/or the town? **It is anticipated that the 5 affected households will be responsible for CWC's standard water consumption rates and that the Town of Coventry will be responsible for additional O & M requirements for this extended water main.**

- DPH must apply for a Priority Funding Area exemption for this project in accordance with [CGS Section 16a-35d](#) because much of the area to be crossed by the proposed water main is not within a Priority Funding Area. Please feel free to contact us to discuss the process, which DPH previously followed for a water main extension in North Stonington. **The Town will assist the DPH with any documentation that might be required for this Priority Funding Area designation. The DPH did employ RCAP to make the determination that this project qualify for Disadvantage Community Program which increase the DWSRF loan forgiveness to up to 50%.**

The actual locations of Priority Funding Areas in that part of Coventry are misleading in the [C&D Plan Locational Guide Map & Priority Funding Areas interactive mapping](#) currently available online. The area of the proposed water main extension is mapped as being a Priority Funding Area "under map option 1 only", but the plan was adopted with the more restrictive "Map Option 2". The updated map must be re-uploaded but, in the interim, the [PDF version of that map](#) shows the correct extent of Priority Funding Areas.

CT DEEP Memo

Permitting/ Regulatory Programs

Remediation

Contact: Veronica Tanguay, Remediation Division, 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

February 23, 2024
Lisette Stone, CT DPH

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.

No response to comment required.

Consumptive Water Diversion

Contact: Melissa Mostowy, Water Planning & Management Division, 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 50,0000 gallons per day.

No response to comment required.

Natural Diversity Database

Contact: Robin Blum, Wildlife Division, 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.

The Town understands that currently the project limits do not fall within the shaded limits of protected areas. The Town will continue to verify with the map up till the design of the project.

Stormwater and Dewatering Wastewaters from Construction Activities General Permit

Contact: Water Permitting and Enforcement Division, 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

February 23, 2024
Lisette Stone, CT DPH

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](#).

The Town of Coventry are aware of the Permitting requirements of the Water Permitting and Enforcement Division and will work with our consultant during our permitting phase to secure all necessary local and state permits.

Information/ Best Management Practices

Aquifer Protection

Contact: Melissa Fahnestock, Water Planning and Management Division, 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.

No response to comment required.

Watershed Management

Contact: Emma Coffey, Water Planning and Management Division, 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.

The Town of Coventry will implement appropriate erosion control measures as outlined in CT DEEP's latest CT Guidelines for Soil Erosion & Sediment Control.

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.

February 23, 2024
Lisette Stone, CT DPH

The Town of Coventry appreciates the preliminary guidance review from CT DEEP and will look forward to maintaining the appropriate contact relative to the appropriate permitting and design process.

Sincerely,
T.M. Penney
Todd Penney, P.E.
Town Engineer

cc: James Drumm, Town Manager
Richard Desrosiers, GZA Geoenvironmental