

**State of Connecticut, Department of Public Health
Drinking Water Section, Drinking Water State Revolving Fund (DWSRF)
ENVIRONMENTAL ASSESSMENT SUMMARY**

Date:	August 7, 2018	Staff Contact:	Eric McPhee
Applicant PWS Name:	City of Groton	Town:	Ledyard
PWSID:	CT0590011		
Project Name:	Emergency Interconnections Between Ledyard Water Pollution Control Authority and Southeast Connecticut Water Authority Water Systems		
Funding Source:	The City of Groton is funding this project as a condition of receiving state grant funds for its water treatment plant upgrade		

This assessment is being conducted in conformance to the generic Environmental Classification Document for Connecticut state agencies to determine Connecticut Environmental Policy Act (CEPA) obligations

Project Description: The City of Groton (City) is receiving financial assistance from the Drinking Water State Revolving Fund (DWSRF) program for the Groton Utilities (GU) Water Treatment Plant (WTP) Upgrade project. The proposed emergency interconnections between the Ledyard Water Pollution Control Authority (WPCA) Water System and five of Southeastern Connecticut Water Authority's (SCWA) small public water systems are associated with WTP Upgrade project as it will enable GU to wheel water through the Ledyard WPCA to provide water supply to the SCWA systems if needed in an emergency. These emergency interconnection projects are essential to provide five of SCWA's small public water systems with the ability to continue providing water service to their customers in the event of an emergency. Although these emergency interconnection projects are not receiving funding from the DWSRF program, they are being scoped due to their association with state grant funding that the City received for the GU WTP project.

The project comprises installation of five segments of new 6-inch and 8-inch diameter ductile iron water pipes totaling approximately 2,070 lineal feet, isolation valves, meter pits, water meters of various sizes, and other miscellaneous appurtenances along Hill Street, Chriswood Terrace, Iron Street, Ferry View Drive, and Fairway Drive in Ledyard, CT. The new main will be connected to the existing distribution system of Ledyard WPCA located at Route 117, Colonel Ledyard Highway, and Route 12. The new main will be installed along the roadway. The water mains have been minimally sized to meet the only the demands for domestic water use for the intended service areas.

Regulations of Connecticut State Agencies (RCSA) Section 22a-1a-3 Determination of environmental significance (direct/indirect)

1. Impact on air and water quality or on ambient noise levels
 - a. Air Quality – 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. It should be noted that only the Department of Energy and Environmental Protection (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.

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.

Groton Utilities equipment is furnished with necessary emission controls to meet CT DEEP's guidelines where applicable. Equipment operators will be briefed on the State of Connecticut's regulation (RSCA 22A – 174-18) regarding excessive idle time.

- b. Water Quality –Hydrostatic pressure testing wastewater discharges resulting from this project are authorized as “potable water system maintenance wastewaters” under the [Comprehensive General Permit](#) for Surface Water and Groundwater (Comprehensive General Permit). No registration is required under the Comprehensive General Permit for this discharge but Groton must comply with operating conditions and effluent limits of the Comprehensive General Permit.

The five (5) areas of pipe testing range from 60-feet to 300-feet in length. The pipes will be fitted with one-inch pipe taps. No valves will be opened until bacteria tests are acceptable and hydrostatic pressure testing is approved.

All disinfecting of water mains will follow AWWA Standard C651-05. Discharge water will be de-chlorinated by discharging the water into a pool with de-chlorination tablets and then discharged to the ground. Most of the construction work will be in the road (pavement) area. In addition to these protective measures, Groton Utilities recently sent in the DEEP's latest General Permit Registration Form and is aware of the terms and conditions required for this testing procedure.

- c. Ambient Noise Levels - The proposed project is not expected to cause significant noise in the immediate area;

2. Impact on a public water supply or serious effects on groundwater, flooding, erosion, or sedimentation

- a. Water Supply – The proposed project is not located within a public drinking water source water protection area. None of the interconnection construction work is either within or in close proximity to either of the two (2) aquifer protection areas in the Town of Ledyard as shown on the latest available map, published by DEEP as of March 23, 2018 (as available on its website).

The Emergency Water Supply Agreement that GU has executed with the Southeastern Connecticut Water Authority and Ledyard WPCA is for the provision of water during a public drinking water supply emergency pursuant to CGS Section 25-32b (i.e. state-declared water supply emergency).

- b. Groundwater - The proposed project is not expected to cause significant impacts to neighboring groundwater.

- c. Flooding –The proposed project is not located within the 100-year flood zone on the community’s flood insurance rate map.
- d. Erosion or Sedimentation - Stormwater discharges from construction sites where one or more acres are to be disturbed, regardless of project phasing, require a permit from the Permitting & Enforcement Division. The *General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities* (DEEP-WPED-GP-015) will cover these discharges. The construction stormwater general permit dictates separate compliance procedures for Locally Approvable projects and Locally Exempt projects (as defined in the permit). A copy of the general permit as well as registration forms may be downloaded at: [Construction Stormwater GP](#).

Groton Utilities intends to maintain Best Management Practices for construction including reduction and mitigation of impacts to surface water runoff quality through the installation of sediment fencing, hay bales, soil socks and other available sedimentation and erosion controls appropriate to the work being performed. Most of the work will encompass the excavation of a 4-foot wide trench within the paved road areas and, as such, soil socks will be used for runoff protection for catch basins and other diversion structures.

- 3. Effect on natural land resources and formations, including coastal and inland wetlands, and the maintenance of in-stream flows – The proposed project is not expected to cause negative impacts. Most of the construction will be in the road. One area will be off the road but there are no wetlands in the area.
- 4. Disruption or alteration of an historic, archeological, cultural or recreational building, object, district, site or surroundings - The proposed project is not expected to cause negative impacts.
- 5. Effect on natural communities and upon critical species of animal or plant and their habitats: interference with the movement of any resident or migratory fish or wildlife species – The proposed project is not expected to cause negative impacts.
- 6. Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to create extensive detrimental environmental impact – The proposed project is not expected to cause negative impacts.
- 7. Substantial aesthetic or visual effects - The project construction is expected to be completed in a short period of time. Due to the nature and timeframe of the project construction, the project is not expected to cause substantial aesthetic or visual impacts in the area.
- 8. Inconsistency with the written and/or mapped policies of the statewide Plan of Conservation and Development and such other plans and policies developed or coordinated by the Office of Policy and Management or other agency – The proposed project is consistent with the last policy of Growth Management Principle #1: MINIMIZE the potential risks and impacts from natural hazards, such as flooding, high winds and wildfires, when siting infrastructure and developing property. Consider potential impacts of climate change on existing and future development. It is also consistent with the last policy of Growth Management Principle #5: PROACTIVELY ADDRESS climate change adaptation strategies to manage the public health and safety risks associated with the potential increased frequency and/or severity of flooding and drought conditions, including impacts to public water supplies, air quality and agriculture/aquaculture production.

9. Disruption or division of an established community or inconsistency with adopted municipal or regional plans- The proposed project is consistent with the Town of Ledyard's Municipal Plan of Conservation and Development Public Water Issues Policies and Strategies, specifically: "Diverse water supply systems should be interconnected, both inter and intra-town, in an effort to increase reliability, supply redundancy, and decrease incidents of reduced capacity. Efforts should be made to establish service area interconnections throughout Ledyard utilizing main roads as pipeline corridors. The following areas should be considered for interconnection:
 - WPCA's Route 12 system with SCWA's Ferry View Heights and Tower Divisions
 10. Displacement or addition of substantial numbers of people - No significant impact expected.
 11. Substantial increase in congestion (traffic, recreational, other) – The proposed project is not expected to create substantial traffic congestion in the area. The Town will provide personnel to maintain traffic rules and public safety in the area.
 12. A substantial increase in the type or rate of energy use as a direct or indirect result of the action - No significant impact expected.
 13. The creation of a hazard to human health or safety - Pre-existing pipes may contain PCB contamination in caulk joints and paint. Care must be taken to properly identify and manage this material when discovered. For further information, contact the Bureau of Materials Management & Compliance Assurance, PCB Program at 860-424-3368. Additional information is also available on-line at: [PCB Program](#).
- Groton Utilities will review existing piping on the SCWA connections. Town of Ledyard piping is typically ductile iron pipe installed less than twenty (20) years ago.
14. Any other substantial impact on natural, cultural, recreational or scenic resources - No significant impact expected.

Conclusions:

Based on the DPH's environmental assessment of this project which includes a review of the comments provided by the DEEP dated June 8, 2018 and response provided by Groton Utilities dated **MONTH D, YYYY**, it has been determined that the project does not require the preparation of an Environmental Impact Evaluation (EIE) under CEPA. The DPH will coordinate with the City of Groton to ensure that the recommendations by the DEEP are implemented.