

WOODRIDGE LAKE SEWER DISTRICT

113 Brush Hill Road
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Goshen, CT 06756

Telephone & Fax 860-491-2705

June 30, 2010

Mr. Paul E. Stacey, Director
Bureau of Water Protection and Land Reuse
Planning and Standards Division
Connecticut Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Re: Woodridge Lake Sewer District response to CTDEP
Approach, Action Plan and Schedule for District regulatory compliance

Dear Mr. Stacey:

The Woodridge Lake Sewer District (WLS D) is pleased to present you with our approach, action plan and schedule for the District's regulatory compliance with the CTDEP requirements of the 1989 Consent Order and subsequent correspondence. Specifically, the CTDEP is interested in reducing potential wastewater impacts on the Bantam River and issued a consent order requiring that the WLS D develop a long-term solution to address capacity issues associated with the WWTF.

At this time, we wish to renew our commitment to the CTDEP. We are confident that our approach will effectively meet the CTDEP's short-term and long-term expectations, and we affirm that this plan will be implemented by the District.

However, we recognize that substantial monies will be required to implement many of the likely improvement scenarios. Given that the District is comprised of approximately 825 users when all lots are built out, betterment assessments for individual homeowners will be at best onerous and in many cases simply unaffordable. To that end, we need assistance from CTDEP through this process with regard to both schedule flexibility and financial assistance. Although we will be investigating a range of financial options, availability of Clean Water Funding under the Small Communities Project Reserve (set aside) will be crucial in our implementing an affordable solution.

Recent changes at the Woodridge Lake Sewer District

We have experienced several significant changes at the WLS D and we believe that these changes will have a positive impact on compliance with the CTDEP. First, we have had some leadership changes and board turnover. These changes have renewed the District's vigor to resolve the environmental challenges that the District faces.

We have hired additional staff to provide better operations and management of the WLS D collection and treatment systems. We now have three licensed operators (including the Chief Operator who is a Grade 4) and one additional

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wastewater professional working for the District which gives us greater resources to operate and maintain the system.

We have also made a change in our technical support team. We are engaging Woodard & Curran to help us through the strategic planning and implementation of our compliance program. Woodard & Curran is a 600 person wastewater engineering leader in the northeast with a strong local presence in Cheshire, Connecticut. In particular, Paul Dombrowski who is Woodard & Curran's technical lead for this project has more than 20 years of wastewater experience and a demonstrated history of cooperation with CTDEP.

All of these recent changes at the WLSO will position us to better meet the expectations of the CTDEP which we are committed to do.

Approach to compliance

We propose a multi-tiered approach to comprehensively addressing CTDEP concerns. The different aspects that our approach include:

Facilities Plan Update comprising:

- Regulatory Review - a review of the status of applicable effluent discharge standards and regulations, how each will impact effluent discharge alternatives and identify opportunities to modify the effluent discharge to reduce environmental concerns and associated costs.
- Disposal evaluation - a review of the 1995 and 2001 hydrogeologic investigation of the WLSO disposal beds and the surrounding area to understand the travel time for flow from the system to the Bantam River. If additional hydrogeologic information is needed, the WLSO is prepared to move forward with field investigations. The evaluation will also consider innovative approaches and/or alternatives if the current system is found to not meet compliance.
- Capacity management - a summary of the WLSO capacity management efforts (i.e., I/I program) and recommendations for program improvements to meet a goal of reducing flows to the WWTF
- Treatment improvements - a review of the treatment options identified in the 2005 study and the identification of interim process optimization options at the WWTF so higher flows and better treatment can be realized
- Regionalization update - update cost estimates and the prior efforts at investigating the benefits and challenges of regionalization
- Financial planning - investigate alternative funding and financing opportunities that the WLSO can leverage to ensure the final recommendation is implementable
- Public outreach and participation - identify and implement a program to educate and involve the public about the improvements of the WLSO system

Upon completion of the Facilities Plan Update, we will work to develop clear recommendations for action including a schedule, cost estimate and

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funding/financing plan. We will submit this Action Plan to the CTDEP and meet with the agency to discuss the Action Plan, as necessary.

We are confident that this approach will balance the investment necessary by the District with the requirements of the CTDEP. Our approach is phased in a manner that allows for stopping points to inform CTDEP and reassess the additional information as it is gathered. This will ensure CTDEP concurrence and present the District with opportunities for project re-scoping (as appropriate), therefore maximizing the District's financial investment.

The specifics of the Facilities Plan Update are described herein:

Regulatory Review

Changes to the Connecticut Water Quality Standards and interpretation of the nature of the existing method of effluent discharge have a significant impact on the resolution of an overall solution for the Woodridge Lake Sewer District. The location of the wastewater discharge, downstream water uses and manner of discharge will be considered in developing the recommended alternative.

We will review the status of applicable effluent discharge standards and regulations, how each will impact effluent discharge alternatives and identify opportunities to modify the effluent discharge to reduce environmental concerns and associated costs.

Disposal evaluation

Since a tributary of the Bantam River borders the WLSD disposal beds, CTDEP has demonstrated a concern regarding the discharge of treated wastewater into a local stream. In an effort to reduce potential impacts on the Bantam River, the CTDEP issued a consent order requiring that the WLSD develop a long-term solution to address capacity issues associated with the WWTF.

We will utilize Woodard & Curran to review the Nathan L. Jacobsen hydrogeologic investigations of the disposal field and verify the disposal field's compliance with CTDEP regulations (the scope of work is attached to this letter). If there are data gaps, we are prepared to conduct field investigations to acquire necessary information.

Capacity management

The WLSD has been active in the reduction of inflow and infiltration (I/I) through various methodologies including manhole and television inspection. We believe that these investigations and subsequent corrective actions have been effective in reducing the I/I contribution to the treatment facility.

We will audit our I/I program and quantify the flow reductions that the District has realized to date and memorialize our capacity management program and provide enhancements to our approach, as appropriate.

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Treatment improvements

The WLSLD hired Nathan L. Jacobsen to perform an Engineering Study of wastewater collection, treatment and disposal alternatives. This study was submitted to the CTDEP for review in February 2005 and included an evaluation of implementing a new Sequencing Batch Reactor (SBR) facility or a Single Sludge Two Stage Modified Luczick-Ettinger (MLE) treatment system.

We will obtain an independent review of these treatment systems, update the projected costs and identify a recommended alternate (or modified system) for the District. This evaluation will include a life cycle cost analysis (LCA) that combines the long-term costs associated with capital expenditures with the operations and maintenance costs to compare local treatment and regional disposal options.

Regionalization options

The February 2005 Engineering Study identified three options for tying into the Torrington sewer system. The District will obtain an independent review of these options, update the costs and perform a LCA that quantifies the operations and maintenance costs associated with long-term operations of a regional solution. The District will also reach out to the Town of Goshen and other community partners to understand their current wastewater needs and other regionalization options.

Financial planning and funding development

The WLSLD understands the capital investment that needs to be made now and in the near future. Regardless of the solution that is chosen, there will be significant costs associated with capital improvements. The District will work to identify funding programs that can be leveraged to support these improvements.

Public education, outreach and participation

The District will work to identify and implement a program to educate and involve the public about the improvements of the WSLD system.

Schedule

The District is committed to making significant progress on this approach quickly. As such, we have developed the following schedule for implementing this program:

- Submit Draft Facilities Plan Update & proposed Action Plan October 30, 2010
- Meet with CTDEP to discuss Update & Action Plan November 2010
- Incorporate CTDEP suggestions & finalize Action Plan 1 month after CTDEP meeting
- Submit final schedule for Action Plan to CTDEP 2 months after CTDEP meeting
- Implement final Action Plan in accordance with approved schedule

We are confident that this approach will balance the goals of the District with the requirements of the CTDEP. Our approach is phased in a manner that allows for stopping points to reassess once additional information is gathered. This presents

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the opportunity for re-scoping if appropriate and therefore reducing the financial burden on the District.

If you have any questions or comments, please contact us anytime.

Sincerely,

BOARD OF DIRECTORS, WOODRIDGE LAKE SEWER DISTRICT

