

November 18, 2016

Lori Mathieu, Public Health Section Chief
CT Department of Public Health
Drinking Water Section
410 Capitol Avenue
MS#51-WAT
PO Box 340308
Hartford, CT 06134-0308

RE: Woodridge Lake Sewer District's Proposed Regional Sewer Connection Project

Dear Ms. Mathieu:

Inadequate treatment and dispersal of sewage from the residential community of Woodridge Lake has been a long standing threat to water quality in Connecticut. In 1989 the Department of Energy and Environmental Protection ("DEEP") entered into a consent order requiring, among other things, Woodridge Lake Sewer District ("WLS D") to investigate the hydraulic capacity of the ridge and furrow dispersal system. After a series of engineering reports that DEEP found inadequate, a comprehensive report in 1995 demonstrated to the DEEP that the WLS D infiltration site located off Brush Hill Road in Goshen was not a viable long term wastewater dispersal option for the treated wastewater from the community. The ridge and furrow dispersal site lacks sufficient hydraulic capacity for current and future peak wastewater flows. When the hydraulic capacity of the dispersal system is exceeded it creates overland flow and a point source discharge to surface waters of the West Branch Bantam River, which is classified as Class AA waters.

To address the above issue, WLS D hired Woodard and Curran to perform wastewater facilities planning. The report completed by Woodard & Curran concluded that the transmission of WLS D wastewater along Route 63 and Route 4 to Torrington's collection system for subsequent wastewater treatment and disposal is the most practical solution to the existing community pollution problem. DEEP concurred with this assessment.

What makes this community pollution problem unique is the size of the taxing district and its location. The community wastewater service area is located within the Shepaug Reservoir Class AA watershed. The current disposal system is located in an adjacent Class AA watershed (Class AA watersheds are existing or potential drinking water supply areas). There are no nearby subsurface treatment options available. In addition, the fiscal burden for any solution will be shouldered by less than 900 property owners. The chosen solution must not only be viable, but also economically practical for WLS D. The recommended route is the most cost-effective solution.

Since DEEP is not the funding agency, an Environmental Impact Evaluation (EIE) is not required at the state level. This project is receiving 100% USDA – Rural Development funding. As a result, the environmental review is addressed through the National Environmental Policy Act (NEPA) process.

In considering the potential environmental impacts of the proposed routes, DEEP offers the following information. The Highland Avenue Alternative was considered less viable due to where it would tie into the existing Torrington wastewater system, the extra cost to implement the system, the hardship to the town of Torrington to have those flows come into the sewer system in a less than desirable location, and the increased possibility of odor issues due to the topography. This route is completely outside the Allen Dam Reservoir Watershed however, it is within a Class AA watershed area and passes by several small public water systems.

The proposed Route 4 Alternative, and the Weed Road Alternative, both pose the same de minimis level of risk to the Allen Dam Reservoir Watershed. Disregarding all other factors, the Route 4 Alternative is a more direct route that traverses below the Allen Dam Reservoir through the Allen Dam Reservoir Watershed. It would connect to Torrington sewers already located in the Allen Dam Reservoir Watershed south of Crystal Lake. All proposed pipes in Torrington will be within existing roadway right-of-way of the CT Department of Transportation (DOT) and transferred to the City of Torrington Water Pollution Control Authority (WPCA) for operation and maintenance. This route has no direct impact to any wetland or water courses along the route within Torrington. The transmission system is specifically designed as a force main so that no changes in zoning nor any expansion of the existing sewer service areas can occur in either town.

The two pump stations utilized to convey the sewage along Route 63 and Route 4 will be situated in Goshen, outside of the Allen Dam Watershed. The force main will then traverse across the town line to Torrington and connect to an existing 24” interceptor. The force main will be double-walled and have transducers to detect leakage which can immediately stop the flow of sewage through the line. DEEP recognizes WLSLD’s efforts to make this pipe as tight as possible and concurs with having it in a road right-of-way rather than going cross-country.

DEEP has also reviewed the Torrington Water Company Water Supply Plan dated February 25, 2009. In the Plan it was noted that the Allen Dam Reservoir has a “low detention time and poor dilution capacity.” The plan also noted that “there exist about 40 potentially contaminating properties on this watershed.” The Water Supply Plan goes on to state that the Company operates the reservoir on an “infrequent basis” based on fire use, severe drought and rainfall occurrences. Further on in the plan, it states that the reservoir is considered an “emergency source” even though it is listed as an active source.

Based on the infrequent use of the reservoir and the minimal possibility of a sewer main break, it appears the potential threat to this reservoir is minimal. DEEP must also weigh other considerations, such as: ability to construct the project, cost impact both for construction and Operation and Maintenance, availability of funding and the preferences of the Torrington Water Pollution Control Authority for this particular route. This project is being funded through USDA Rural Development and also includes replacement of thousands of feet of existing old pipe in Torrington at NO COST to Torrington. It is also the most cost effective solution. Should that funding be lost, the project would revert to pursuing state funding at a higher cost to state tax payers. In addition, please keep in mind that were this project to be funded with state monies, WSLD would be obligated to construct the most cost-effective solution to remediate the existing

community pollution problem in accordance with the cost-effectiveness requirement of the federal Clean Water Act.

On balance, DEEP believes the high level of protection of the water sources along the route through pipe location and design and the commitment from both WLS D WPCA and the Torrington WPCA to work together for the best solution for both communities makes the Route 4 the best option. The City of Torrington has a vested interest to protect the water supply not just for the privately owned Torrington Water Company but for the citizens of Torrington. The route chosen provides the necessary balance to resolve a long standing community pollution problem and improve water quality while providing appropriate protection of watersheds. DEEP commends the Torrington WPCA for its inter-municipal cooperation that is essential for solving this on-going community pollution problem.

The proposed project results in advancements in water quality and presents a de minimis threat to the watershed. On balance this is a solution that meets ambient water goals while protecting public water supplies.

If you have any addition questions or need additional information, please contact Denise Ruzicka of my staff at (860) 424-3853 or by email at denise.ruzicka@ct.gov.

Sincerely,



Betsey Wingfield
Bureau Chief
Bureau of Water Protection and Land Reuse

cc: Johan Strandson, USDA-RD (via e-mail)
Ray Turri, President, WLS D (via e-mail)
Oswald Inglese, DEEP (via e-mail)