



September 8, 2010

Paul 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: Wastewater Disposal
Woodridge Lake Sewer District

Dear Mr. Stacey:

Woodard & Curran (W&C) has been retained by the Woodridge Lake Sewer District (WLS D) to assist them with identifying options to address their wastewater treatment and disposal challenges. We are contacting you on behalf of WLS D for two primary reasons:

1. To request a meeting with appropriate Connecticut Department of Environmental Protection's (CTDEP) staff that have the background and authority to provide input on regulatory issues facing WLS D, and;
2. To solicit input from CTDEP regarding the major questions that WLS D needs to understand relative to effluent disposal from their wastewater treatment plant.

WLS D has been devoting considerable time, money and energy towards evaluating options for upgrading its wastewater treatment and disposal system in order to comply with all CTDEP regulations and consent order conditions. WLS D understands that a connection to the City of Torrington collection system is one possible option to address their wastewater treatment and disposal challenges. However, WLS D leadership is investigating other viable alternatives in an effort to provide the most cost effective service for their users while addressing environmental and regulatory concerns.

WLS D appreciates the support and positive contributions by various CTDEP staff during discussions and efforts to move toward a solution. In order to facilitate further progress in the evaluation of alternatives, we request a meeting between representatives of the WLS D and CTDEP staff to discuss regulatory issues, discharge options and to provide WLS D with clear feedback on various options to develop a long-term solution that complies with CTDEP rules and regulations in a financially responsible manner. The District prefers that the meeting take place in Goshen at the site so that all participants can view the conditions and get a better understanding of the challenges and opportunities present. WLS D acknowledges and understands the demands on CTDEP staff schedules and will be flexible in setting a date that is most convenient for all to attend. We believe that you, Joe Wettemann and Ann Straut-Esden should attend this meeting although other CTDEP staff are welcome to attend as they may offer insight into various issues related to the WLS D.

In order to facilitate discussions at the upcoming meeting, WLS D offers several items that warrant discussion, clarification or guidance from CTDEP prior to or at the requested meeting so that WLS D can efficiently direct its resources toward identifying environmentally acceptable and financially viable alternatives.



A. Water Quality Standards and Classification

We would like to better understand the basis for the water quality classifications in the Bantam River and adjacent groundwater, specifically:

1. Is there any existing or proposed water supply source downstream of the WLS D that is the basis for the AA and GAA water quality classifications in the area?
2. It is our understanding the Town of Litchfield Water Pollution Control Facility discharges to the Bantam River downstream of the WLS D site under a National Pollutant Discharge Elimination System (NPDES) permit that requires secondary treatment. However, the existing surface and groundwater classifications in that area are B/AA and GAA, respectively and no changes are identified in the proposed classification update (except dropping the "B" present condition status). How do the Water Quality Standards address this issue?
3. Have there been any petitions to change the classification for either AA or GAA waters? Will CTDEP entertain a change in the water quality classification for the project site from AA/GAA to A/GA?
4. Our interpretation of the proposed changes to the Water Quality Standards is that a change to the surface water classification in the area of the WLS D Site to Class A may allow a surface water discharge under Standard #9 in the draft Water Quality Standards. Can you clarify this interpretation?

B. Discharge Requirements

A permitted discharge to the groundwater is limited by the groundwater hydraulics at the site. A few items we wish to discuss and better understand include:

1. The design guidance for groundwater disposal identifies a minimum 21-day travel time. Will CTDEP allow a system with less than a 21 day travel time if advanced treatment is provided prior to application in the infiltration beds? We have seen this approach applied in other New England states, has it ever been applied in Connecticut?
2. The use of a constructed wetlands after the treatment system with overland flow could provide a redundant advanced treatment step as well as providing a diffuse discharge of the effluent. Has CTDEP accepted or would CTDEP consider a discharge via a wetlands system as a method of indirect discharge?
3. Will CTDEP allow use of non-traditional methods to transmit treated wastewater to groundwater if a high level of treatment is provided? For instance, there is often a very permeable soil layer at the interface of the overlying soil and bedrock. Should such a layer exist on the site and demonstrate the capability to accept the design wastewater flow, would CTDEP permit this as a means of groundwater discharge?
4. What discharge limits does CTDEP expect to require for the effluent from the WLS D wastewater treatment system prior to discharge via the options identified?

C. Related Items of Interest

1. The WLS D is very concerned about its impact on the ecosystem. The District carefully monitors the Bantam River to understand potential impacts of wastewater discharged. Is there any record of impairment of waters downstream of the WLS D discharge?

2. How will CTDEP policies impact future users within the existing WLSL geographic boundaries? The District boundaries have not changed since it was founded approximately 40 years ago. Although a limited number of unconnected lots remain, all parcels within the District have paid the capital and operating costs for sewer service since the District was created. It is important to consider the rights of all property owners in developing a wastewater solution for WLSL and that including all property owners will improve the affordability for whatever solution is implemented.



I will be contacting you in the near future to discuss the issues facing WLSL and potential meeting dates. Do not hesitate to contact me at 203-605-1297 or pdombrowski@woodardcurran.com if you wish to discuss this matter.

Sincerely,

WOODARD & CURRAN

Paul A. Dombrowski
Paul A. Dombrowski, PE, BCEE
Vice President

PAD/lm
Project No. 223604.01

Cc: Ann Straut-Esden
Ray Turri, WLSL President
Ken Green, WLSL Planning Committee Chair