

October 13, 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: September 27, 2010 Meeting Summary
Woodridge Lake Sewer District

Dear Mr. Stacey:

On behalf of the Woodridge Lake Sewer District (WLSD) we would like to thank you and the other CTDEP managers and staff who took the time to meet with the District and Woodard & Curran on September 27, 2010. The meeting was a productive interchange of information and ideas and it also identified the need for some follow-up information gathering and decision making related to the long-term resolution of the wastewater treatment, disposal and permitting associated with the District's system. This letter briefly summarizes the topics presented and discussed at the meeting, outlines the responses to the questions in our September 8, 2010 letter to CTDEP and identifies remaining issues which need clarification.

The meeting attendees were:

CTDEP:	Woodridge Lake Sewer District:	Woodard & Curran:
Paul Stacey	Raymond Turri	Paul Dombrowski
Ozzie Inglese	Chip Roraback	Cary Parsons
Michael Hart	Jim Mersfelder	Jay Sheehan
Joe Wettemann	Ken Green	Paul Hogan
Rob Hurst		
Ann Straut-Edsen		

Topics Presented/Areas of Discussion:

- Raymond Turri presented a historical review of the WLSD organization, its recent activities and interactions with CTDEP and highlighted an upcoming meeting to be held on October 2, 2010 with the residents of the WLSD.
- Chip Roraback gave an overview of how the District and the lake area were formed with its establishment going back forty years.
- Paul Dombrowski presented an overview of the site, the previous studies conducted and some of the unique features of the location.
- Paul Hogan presented an overview of the existing and proposed water quality classifications for the surface and ground waters in the watershed and the location of three wastewater discharges with relevance to the situation surrounding WLSD.
- Cary Parsons provided an overview of the hydrogeology at the site, highlighted site constraints, described elements of previous studies and areas where additional information is needed.



- Paul Dombrowski provided an overview of the District including the collection system, the current wastewater treatment system and the situation with current and probable future connections to the system. Paul also referenced the 2005 facility plan and some of the outcomes from that report.

Responses/Discussions to questions presented by WLSL / W&C to CTDEP (September 8, 2010 correspondence):

1. The surface and groundwater in the WLSL area and immediately downstream within the Bantam River watershed are currently designated as A/AA and GAA, respectively. Current water quality mapping of the area generally indicates that water quality in this area complies with current and proposed water quality standards. The surface water classification of Class AA is based upon a designation by the CT Water Resources Planning Board in the 1970's that the area has "potential" for use as a water supply. This designation was made over three decades ago but use as a water supply has never been realized. The future use of the West Branch of the Bantam River as a water supply, if ever, would likely be limited to high flow "skimming" to an existing reservoir.
2. Current water quality mapping indicates that the West Branch of the Bantam River downstream of the WLSL site meets current water quality standards to the Connecticut Junior Republic (CJR) site where the water quality designation changes to B/AA. This designation indicates that the current water quality from the CJR site downstream only achieves Class B standards although the water quality goal is Class AA. This B/AA designation is shown along the River through Bantam Lake, past the Litchfield WPCF surface water discharge to the confluence with the Shepaug River, and beyond. The CJR discharge was recently converted to a groundwater discharge, however the Litchfield WPCF surface water discharge was permitted prior to the development of water quality classifications and related discharge prohibitions. The surface water discharge from the Litchfield WPCF will be allowed to remain as it is considered a "grandfathered" non-compliant discharge.
3. The Class AA water quality classification (assuming no change when the water quality standards are finalized) prevents any new surface discharge (NPDES) in the WLSL area. Discharge under the groundwater permit program will be allowed if the site meets CTDEP groundwater treatment guidelines.
4. A change in the classification (e.g. from Class AA to Class A or B) would be accomplished through a petition to CTDEP for such a change. This action would be subject to the standard public notification and hearing process. No change in water quality classification from AA to A has ever been petitioned for or approved in the state and CTDEP indicated a classification change of this nature is very unlikely.
5. A travel time for treated wastewater via subsurface disposal of less than 21 days may be possible at the permitted capacity if sufficient data and engineering analysis confirms that conditions are acceptable to CTDEP, i.e., a 5-log reduction of pathogens prior to subsurface disposal.
6. Constructed wetlands and lateral overland flow could be part of a wastewater treatment and disposal option; however, CTDEP considers a discharge from either of these technologies directly to the Bantam River as a surface water point source discharge which is prohibited in Class AA waters.
7. The discharge of treated wastewater through a groundwater disposal system has been approved at this site and thus the injection to a permeable layer is possible if sufficient evaluation and study confirms that groundwater flow meets acceptable regulatory and design guidelines. The parameters of concern and the extent of the evaluation and testing will be defined with CTDEP during the facilities plan scoping process.
8. Treatment levels and discharge limits for parameters not previously included in the existing groundwater disposal permit would be based upon best available technology (BAT) which is not strictly defined but would be part of the discussion and negotiation in the permitting process.



9. There is no specific known impact on the Bantam River adjacent to the WLSD site. The change in current condition in the watershed is related only to the presence of a previous surface water discharge at the Connecticut Junior Republic site that has since been converted to a subsurface disposal.
10. The WLSD may be able to provide sewer service within their existing District boundaries if the full build out capacity remains within the current "capacity" of the system (WLSD is at 85% build-out now). The current discharge capacity was defined as the existing permitted mass loading (permitted flow of 100,000 gpd multiplied by permitted pollutant concentrations).

Issues Needing Clarification:


- A. Our review of the 2008 State of Connecticut Integrated Water Quality Report did not identify the area downstream of the WLSD nor the area downstream from Junior Republic site as areas of non-attainment. Are there other water quality reports that identify impairment in these areas?
- B. Our file search did not identify any field verification of breakout in the disposal site. Does CTDEP have any field inspection reports documenting the nature and extent of breakout at the site?

Please notify me at your earliest convenience with any comments or corrections related to this meeting summary.

The Woodridge Lake Sewer District is committed to establishing a sound, fiscally responsible and long-term solution to its wastewater collection, treatment and disposal needs. The meeting set forth a positive interchange of concepts and ideas. Woodridge Lake Sewer District along with Woodard & Curran look forward to continuing this positive dialogue and moving forward with an environmentally and fiscally responsible solution.

Sincerely,

WOODARD & CURRAN


Paul A. Dombrowski, PE, BCEE
Vice President

PAD/lm
Project No. 223604.

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