



STATE OF CONNECTICUT

DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION

OFFICE OF ENVIRONMENTAL REVIEW

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**To:** Eric McPhee - Supervising Environmental Analyst  
DPH - Drinking Water Section, 450 Capitol Avenue, MS#51WAT, Hartford

**From:** David J. Fox - Senior Environmental Analyst      **Telephone:** 860-424-4111

**Date:** July 6, 2015      **E-Mail:** [david.fox@ct.gov](mailto:david.fox@ct.gov)

**Subject:** Lathrop Road Water Main, Plainfield

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The Department of Energy & Environmental Protection has reviewed the Notice of Scoping for the proposed installation of a water main along Lathrop Road Extension to serve existing and proposed businesses in Plainfield. The following comments are submitted for your consideration.

The water main route crosses the 100-year flood zone on the community's Flood Insurance Rate Map that is associated with a tributary of Mill Brook. Because it is a State action, the project must be certified by DPH as being in compliance with flood and stormwater management standards specified in section 25-68d of the Connecticut General Statutes (CGS) and section 25-68h-1 through 25-68h-3 of the Regulations of Connecticut State Agencies (RCSA) and receive approval from the Department. State policy regarding floodplain development is articulated at section 25-68d(b)(4) of the CGS: "The proposal promotes long-term nonintensive floodplain uses and has utilities located to discourage floodplain development." In order to be able to be certified by the funding agency, the proposal must be determined to be a nonintensive floodplain use and designed to discourage floodplain development.

In this instance, the 100-year flood zone encompasses portions of several of the vacant parcels along Lathrop Road Extension. If the project is to support development of these parcels, an exemption will likely be required pursuant to section 25-68d(d) of the CGS. In order to obtain an exemption it must be demonstrated by DPH that the project is in the public interest, will not injure persons or damage property and complies with the provisions of the National Flood Insurance Program. For further information, contact the Inland Water Resources Division at 860-424-3706. A fact sheet regarding floodplain management and the certification form can be downloaded at: [Flood Management](#).

The Natural Resources Conservation Service's Soil Survey depicts a band of Walpole sandy loam, a regulated wetland soil, that is crossed by Lathrop Road Extension. It is unknown whether the main will be installed under the roadway or shoulders, with no direct wetland impacts, or beyond previously filled areas. If there are any undeveloped areas within the area to be impacted, it is recommended that a certified soil scientist perform a reconnaissance of the site in order to determine whether there are any areas which would be regulated as wetlands or watercourses as defined by section 22a-38 (15) and (16) of the CGS, respectively. If the reconnaissance identifies regulated areas, they should be delineated. Any inland wetlands or watercourses at the site are regulated by the local inland wetlands agency, pursuant to section

22a-42 of the CGS. Many local agencies have established setback or buffer areas and require review and approval of activities within these upland areas adjacent to wetlands or watercourses. The local agency should be contacted regarding permit requirements.

In order to protect wetlands and watercourses on and adjacent to the site, strict erosion and sediment controls should be employed during construction. The *Connecticut Guidelines for Soil Erosion and Sediment Control* prepared by the Connecticut Council on Soil and Water Conservation in cooperation with DEEP is a recommended source of technical assistance in the selection and design of appropriate control measures. The 2002 revised edition of the Guidelines is available online at: [Erosion Control Guidelines](#).

Stormwater discharges from construction sites where one or more acres are to be disturbed, regardless of project phasing, require an NPDES 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). Locally Exempt construction projects disturbing over 1 acre must submit a registration form and Stormwater Pollution Control Plan (SWPCP) to the Department. Locally Approvable construction projects with a total disturbed area of one to five acres are not required to register with the Department provided the development plan has been approved by a municipal land use agency and adheres to local erosion and sediment control land use regulations and the *CT Guidelines for Soil Erosion and Sediment Control*. Locally Approvable construction projects with a total disturbed area of five or more acres must submit a registration form to the Department prior to the initiation of construction. This registration shall include a certification by a Qualified Professional who designed the project and a certification by a Qualified Professional or regional Conservation District who reviewed the SWPCP and deemed it consistent with the requirements of the general permit. The SWPCP for Locally Approvable projects is not required to be submitted to the Department unless requested. The SWPCP must include measures such as erosion and sediment controls and post construction stormwater management. A goal of 80 percent removal of total suspended solids from the stormwater discharge shall be used in designing and installing post-construction stormwater management measures. The general permit also requires that post-construction control measures incorporate runoff reduction practices, such as LID techniques, to meet performance standards specified in the permit. For further information, contact the division at 860-424-3018. A copy of the general permit as well as registration forms may be downloaded at: [Construction Stormwater GP](#).

If the water mains are to be tested and disinfected, the discharge would be covered by the *General Permit for the Discharge of Hydrostatic Pressure Testing Wastewater* (DEP-PERD-GP-011). This general permit applies to all discharges of waters used to test the structural integrity of new or used tanks and pipelines that hold or transfer drinking water, sewage, or natural gas. The general permit contains pH, chlorine, oil and grease, and suspended solids limits which will need to be complied with during the testing and verified through monitoring. Registration is required to be submitted to the Department in order for the discharges to be authorized by this general permit. A fact sheet, the general permit which includes the registration form, titled Notice of Coverage, and the Application Transmittal form may be downloaded at: [Hydrostatic GP](#)

Development plans for utilities in urban areas that entail soil excavation should include a protocol for sampling and analysis of potentially contaminated soil. A soil management plan should be developed for the project to deal with soils during construction. The Department's *Guidance for Utility Company Excavation* should be used as a guide in developing the plan. The guidance is available on-line at: [Utility Guidance](#) .

The Natural Diversity Data Base, maintained by DEEP, contains no records of extant populations of Federally listed endangered or threatened species or species listed by the State, pursuant to section 26-306 of the CGS, as endangered, threatened or special concern at either project area. This information is not the result of comprehensive or site-specific field investigations. Also, be advised that this is a preliminary review. A more detailed review may be conducted as part of any subsequent environmental permit applications submitted to DEEP for the proposed site. Consultation with the Natural Diversity Data Base should not be substituted for on-site surveys required for environmental assessments. The extent of investigation by competent biologist(s) of the flora and fauna found at the site would depend on the nature of the existing habitat(s). If field investigations reveal any Federal or State listed species, please contact the DEEP Geologic & Natural History Survey at 860-424-3540.

Thank you for the opportunity to review this project. If there are any questions concerning these comments, please contact me.

cc: Jeff Caiola, DEEP/IWRD  
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