

**Draft Minutes of the September 9, 2019 Water Authority Meeting  
Southeastern Connecticut Water Authority  
1649 Route 12, Gales Ferry, CT**

**Present**

**Authority:** Chairman Edward Monahan, Treasurer Paul Eccard, Peter Balestracci, Barbara Lee Franciosi, Nicholas Mullane, Claudia Koerting.

**Authority Staff:** General Manager Josh Cansler

**Call to Order**

Chairman Monahan called the meeting to order at 5:15 p.m.

**Public Comment on any Item on the Agenda** – None

**Approval of Prior Minutes**

On a motion of Mr. Eccard, seconded by Mr. Balestracci, the Authority approved the minutes of the August 12, 2019 Water Authority Meeting, by a vote of 6-0.

**Correspondence**

*(Attachment #1: EPA Ground Water Rule: A Quick Reference Guide)*

*(Attachment #2: Article: "Audit of Montville WPCA shows an agency without oversight" from The Day newspaper, dated Aug 24, 2019)*

*(Attachment #3: Article: "Study linking mother's fluoride exposure to lower IQ scores in kids raises questions" from the USA Today newspaper, dated Aug 19, 2019)*

General Manager Cansler stated there were three items included in the correspondence folder that did not pertain to items to be discussed in the General Managers report. The first item is a copy of the quick reference guide on the EPA's Ground Water Rule. This was presented and discussed at the end of the last Authority meeting. The second item was a copy of an article from *The Day* newspaper that discussed improprieties discovered during an audit of the Montville WPCA. The third item was an article from the *USA Today* newspaper about a new study linking mother's fluoride exposure to lower IQ scores in children. General Manager Cansler stated that this was one of four articles contained in an AWWA (American Water Work Association) public affairs advisory regarding the fluoride study. Mr. Cansler said that he periodically receives email advisories/updates from AWWA on various subjects related to water issues.

**General Manager's Report**

**1. Tower Water Main Break – August 26, 2019**

*(Attachment #4: Cost Proposal from CodeRed for \$4,000 (annual cost) to establish, maintain, and operate emergency notification network)*

General Manager Cansler stated that at approximately 8:15 pm on Monday, August 26<sup>th</sup> SCWA on-call personnel were alerted that there was low pressure at the Tower Division. He said Foreman Brandon Belair quickly determined that there was a water main break on the line leading from the pumphouse to East Drive. He called General Manager Cansler and informed him that we would have to do a complete shutdown of the system to replace the line.

Due to new guidance from DPH regarding emergency repairs of water mains Mr. Cansler decided that it was best to call the DPH after hours line to report the unplanned interruption of water service. After the DPH on-call person consulted with Lori Mathieu, Chief of the DPH Drinking Water Section, they recommended that SCWA should notify customers to boil water until samples can be taken in the system, and come back negative. Although this is a chlorinated system they felt the extra precaution was warranted. They also requested SCWA contact the local health district, which Mr. Cansler did.

General Manager Cansler told DPH that although they were looking at different options regarding emergency notifications, the only way SCWA currently has to notify customers of a boil water advisory was via our website and Facebook pages. Mr. Cansler put a boil water advisory on both the website and Facebook, and requested the local Health Director to do the same. Mr. Cansler also spoke with a local radio station regarding the boil water advisory. The water main break was repaired in 2 hours and the system was only shutdown for 30 minutes total. Because of the size of the Tower distribution system it took about an hour to get back up to full pressure in the system.

As mentioned earlier, SCWA staff was already gathering a list of companies that specialize in assisting with emergency notifications using automated systems that can simultaneously call, or text, hundreds of customers at one time. The day after the Tower outage the SCWA General Manager and Office Manager met with CodeRed, a company recommended by Aquarion. CodeRed, a division of Onsolve, LLC, offers the ability to send voice or text messages based on specific geographical areas, or to all our customers, at one time. This system can also be used to send out notifications for scheduled maintenance, such as flushing water mains. Customers will have to provide phone numbers, or sign themselves up for this system to work. Total cost for this system will be \$4,000/annually. This includes start-up costs and annual updates to the database of customers.

Also on the day after the outage, General Manger Cansler requested estimates for replacing the water main from the Tower pump station to East Drive. This main has had three breaks over the past 18 months. Total cost for replacing the main would be approximately \$28,000. This estimate is based on using SCWA staff to install the mains.

Mr. Cansler said that understandably the customers in the Tower division are upset as this last outage was the 5<sup>th</sup> outage in 5 months. Unfortunately 3 of the 5 outages this year were caused by contractors working too close to our water mains. SCWA has addressed our concerns with the contractors involved, including Eversource sub-contractors replacing utility line poles in Tower. DPH has scheduled a meeting on September 17<sup>th</sup> to discuss the frequent outages at Tower with SCWA, the Mayor of Ledyard, and several local state representatives. Chairman Monahan encouraged other Authority members to attend the meeting to represent SCWA.

After some discussion, Mr. Eccard made a motion to replace the water main, at a cost of \$28,000, from the Tower pump station to East Drive. His motion, seconded by Mr. Mullane, was approved by a unanimous vote of all members present.

Mr. Eccard made a second motion to contract with the company CodeRed to establish, maintain, and operate an emergency notification network for all SCWA Divisions at an annual cost of \$4,000. His motion, seconded by Mr. Mullane, was approved by a unanimous vote of all members present.

## **2. Tower Division - Well #3**

SCWA is continuing to move forward on the replacement of Tower Division Well #3, which failed last summer. In conjunction with Department of Public Health (DPH) and the CT Water Works Association (CWWA), SCWA was able to get language inserted into a legislative bill to allow installation of replacement wells within wetlands constrained boundaries, as long as the replacement well is not closer to wetlands. This bill, specific to Ledyard, was approved during the recent State legislative cycle, and signed by the Governor. In June, SCWA resubmitted the application for the replacement well, and reached out to SB Church Well & Pump to schedule the installation of the well. DPH is still reviewing the resubmitted application. General Manager Cansler stated that on August 28, 2019 DPH finally conducted a site visit of the proposed well replacement site. Their representative claimed she would expedite approval of the new well site. Mr. Cansler said that SB Church conducted an onsite visit to Tower Division on September 4<sup>th</sup>, and planned to install a test well on September 11<sup>th</sup>.

## **3. Ledyard Center Easement**

*(Attachment #5: Copy of Grant of Permanent easement for property where the SCWA Ledyard Center Pumphouse and wells are located)*

In April, General Manager Cansler and SCWA Attorney Nick Kepple met with the Town of Ledyard Mayor, Fred Allyn III, and Town Attorney, Meredith Diette, regarding the development of an easement for the section of property where the SCWA Ledyard Center pumphouse and wells are located. This land, which is currently owned by the Town, is in the process of being sold to a private developer, so the Town is interested in completing the easement as soon as possible. At the April 2019 meeting, the Authority authorized Chairman Monahan to sign the easement, once it has been reviewed and approved by SCWA legal counsel. The site survey for the easement was completed in early May. General Manager Cansler stated that he received a copy of the Grant of Permanent easement for the SCWA pumphouse property on September 5<sup>th</sup> and that the easement was scheduled to be signed on September 11<sup>th</sup>. The Town Attorney assured Attorney Kepple that SCWA would be forwarded a copy of the easement as soon as it was signed.

## **4. Emergency Interconnections with Ledyard/Groton Utilities**

In 2017 SCWA signed an agreement with Groton Utilities and Ledyard WPCA to install emergency water main interconnections between all five SCWA Ledyard divisions, and the Ledyard WPCA system. These projects are fully funded through a funding package Groton Utilities received from the State. Groton Utilities completed the Tower/Ferry View and Barrett interconnections last fall, and the Chriswood and Ledyard connections in May of this year. Construction of the interconnection between the SCWA Ledyard Center and the Gray Farms Divisions is expected to start this summer, pending approval of a state right-of-way permit for the section along Route 214.

Prior to starting construction SCWA expressed concern to the project engineers at Groton Utilities regarding increased velocity and water pressure due to the decrease in elevation between the Ledyard pump station and Gray Farms. Our calculations, verified by our consulting engineer, have determined that a pressure reducing valve (PRV) should be installed during construction of this line, if in the future, SCWA wants to use the new line to supply water between the Ledyard pump station and the Gray Farms Division. However, Groton Utilities calculations are based on the pressure from their interconnection on RT 117, which is much lower than the pressure leaving Ledyard pump station. Using the pressure at the RT 117 interconnection as a basis, the pressure increase does not justify a PRV. Since the agreement with Groton Utilities/Ledyard WPCA is for a functional interconnection between WPCA and SCWA, Mr. Cansler said we will have to install the PRV at a later date if in the future we want to supply water to Gray Farms from Ledyard using the new interconnection.

## **5. Thames Aquatic Club –Ledyard**

*(Attachment #6: DPH letter to Thames Aquatic Club, LLC; :RE: CPCN Phase 1-A Well Site Suitability Certification for Well #1 – Approved withdrawal rate of less than ten gallons per minute”, dated April 17, 2017)*

*(Attachment #7: Draft SCWA Letter to DPH requesting more clarification on SCWA’s responsibilities regarding the Aquatic Club water supply)*

The new Thames Aquatic Club in Ledyard, which is in an SCWA Exclusive Service Area, opened for business in July. During the planning process SCWA offered to provide water from our Ledyard Center system. Instead DPH granted approval of a well for the Aquatic Club, with the stipulation that they connect to the water main if it is ever extended to their property as part of a proposed Fairway Drive extension in the future.

After the Aquatic Club opened General Manager Cansler reached out to DPH regarding their requirements for a certified operator. DPH stated that due to the Aquatic Club’s small full-time staffing requirements they designated the Aquatic Club as Transient Non-Community facility, meaning the Club is not required to have a certified operator. They are required to have a certified lab conduct periodic sampling.

At the August meeting the Authority expressed concern that SCWA could still be held liable for any water related problems at the Aquatic Club because the Club is within the SCWA Exclusive Service Area of Ledyard, especially since the original letter granting the Aquatic Club approval for a well (attached), states that SCWA is required to be the certified operator. Based on these concerns, the Authority felt that they should send a formal letter to DPH asking for more clarification on SCWA’s responsibilities regarding water at the Aquatic Club. Mr. Eccard made a motion that the Authority authorize the Chairman sign a letter to DPH, prepared by the General Manager, which is attached. His motion, seconded by Ms. Franciosi, was approved by a unanimous vote of all members present.

## **6. Claim by Raspberry Junction Holding, LLC vs SCWA**

In 2016, Raspberry Junction LLC, owners of the Bellissimo Grande Hotel in North Stonington, filed a legal claim against SCWA for losses incurred during the water outage that resulted from the rupture of a pressure tank in 2015. This claim was forwarded to our insurance company at the time, Gladfelter Insurance. They hired Attorney Stephanie Berry, of the law firm of Tang & Maravelis, in New London, to handle the case. Although Gladfelter, has proposed settlements on two occasions, Raspberry Junction did not agree to either proposal.

After a series of hearings at the lower courts the case was forwarded to the Connecticut Supreme Court in September 2017. The Connecticut Supreme Court heard the case on November 13, 2018, and on April 3, 2019 the State Supreme Court issued a ruling that reversed the trial court’s granting of the summary judgment motion, holding that the SCWA lacks authority to promulgate a rule that immunizes it from liability for disruption in water service.

As a result, the case was remanded back to the trial court for consideration of the summary judgment argument, based on the alternative grounds of the economic loss doctrine, which the trial judge declined to rule on. This trial has been scheduled to commence on April 6, 2020 at the New London Superior Court. On July 10<sup>th</sup>, and again on July 22<sup>nd</sup>, Attorney Berry met with Mr. Cansler regarding written interrogatories and requests for documentation submitted by the Attorney representing, Raspberry Junction. On August 28, 2019 Attorney Berry informed Mr. Cansler that they were making another formal settlement offer to Raspberry Junction.

## **7. PFAS (Per- and Polyfluoroalkyl Substances)**

Earlier this year DPH required all water systems that prepare water supply plans, which includes SCWA, to conduct an evaluation of potential contamination resulting from possible nearby sources of per- and polyfluoroalkyl substances (PFAS). All utilities were required to complete a vulnerability assessment study for each system. In late March assessments for all 14 SCWA divisions were submitted to DPH. SCWA has not heard anything back from DPH regarding the assessments.

In July 2019 Governor Lamont announced he is convening a working group to examine issues related to the PFAS contamination. His PFAS Interagency Working Group held its first meeting on July 30th. The working group established three committees to focus on addressing PFAS: 1) Human Health; 2) Pollution Prevention; and 3) Remediation. The Governor has requested a State Action Plan for PFAS contamination no later than October 1<sup>st</sup>. It appears that the Human Health Committee will be tasked with developing a recommendation for state drinking water standards due to the absence of any federal regulation in this area.

General Manager Cansler attended a PFAS Workshop on August 13<sup>th</sup> which included PFAS background, sampling procedures, treatment, and communication. He also attended a special session of the CWWA (CT Water Works Association) legislative Affairs Committee to discuss the State Action Plan, and the potential impact the plan may have on utilities.

Mr. Cansler stated that they are holding off on sampling for PFAS until the State, or EPA, establish guidelines for allowable levels. He said the other reason they are waiting to sample is there is currently only one lab in the state that can test for PFAS in water.

## **8. Four-log Applications and North Stonington Chlorine Treatment Application**

Applications were submitted to DPH on January 17, 2019 requesting 4-log certifications for all SCWA systems which treat water with chlorine, and meet minimum storage requirements. Currently 9 of our 14 systems meet both requirements. In addition SCWA has submitted a request to start chlorine treatment at the North Stonington system in November 2018. A 4-log certification request was submitted for North Stonington as well.

If the applications are approved, SCWA will be able to reduce our sampling/testing requirements, and SCWA will not have to conduct a public notification for positive e-coli results, from samples taken before treatment. The North Stonington application to start chlorine treatment was approved on June 21, 2019, and treatment started on July 1<sup>st</sup>. The 4-log applications are still under review at DPH.

## **9. Updated Asset Management Plan**

In February 2019 SCWA submitted an updated application to the Drinking Water State Revolving Fund (DWSRF) program for a project to upgrade the Tower Division pumphouse, and add a water tank. The DWSRF program provides low-interest loans, with the potential for up to 25% subsidization, for eligible projects in the form of principal forgiveness. As part of the program SCWA is required to have an updated Asset Management Plan. DPH has indicated that SCWA's current plan, submitted in 2016, needs to be updated for SCWA projects to be funded under the DWSRF program. At the May meeting the Authority approved a motion to have Lenard Engineering update the 2016 Asset Management Plan.

#### **10. Replace Montville Manor Distribution System**

In March General Manager Cansler and Foreman Brandon Belair met with the Montville Director of Public Works, Don Bourdeau, along with their consulting engineer from CLA Engineers, to discuss paving of several roads in SCWA areas of Montville. This was a follow-on to an initial meeting last year which included a discussion of the feasibility of replacing the Montville Manor distribution system, which has numerous leaks each year. The Town of Montville is concerned that frequent leaks will result in numerous patches in their new pavement. At that time SCWA explained that the costs would be well beyond SCWA's fiscal ability to fund. During the meeting in March, the Montville consulting engineer provided a list of streets to be paved over the next 5 years. This list included six streets in four SCWA divisions. At the last RAB, Representative Siragusa of the Town of Montville, expressed a desire for SCWA to look into the ongoing problem of service line repairs in the Montville Manor. Mr. Cansler said he would set-up a meeting with the Montville DPW Director to discuss.

#### **11. Fiscal Year 2019 Annual Audit**

General Manager Cansler stated that Sandra Welwood will conduct her on-site audit visit on September 19, 2019. She intends to present her audit findings to the Representative Advisory Board (RAB), and Water Authority, at the quarterly RAB meeting in January 2020.

#### **12. Regional Considerations**

**a) State Water Plan:** The State Water Plan was approved by the legislature in early June and is awaiting a formal signature by the Governor. A State Water Plan Implementation Workgroup has been created by the Water Planning Council (WPC) to monitor adherence to the plan, and provide guidance to the WPC regarding implementation.

**b) Water Utility Coordinating Committee (WUCC):** The Eastern Water Utility Coordinating Committee (WUCC) last met on Nov. 14, 2018 at the Southeastern Connecticut Council of Governments (SCCOG) office. The date of the next meeting is to be determined. These meetings are open to the public.

**c) SCWA Interaction with SCCOG:** SCWA and the SCCOG continue to interact cooperatively. To this end, Chairman Monahan attends the monthly SCCOG meetings if there are items relating to water on the agenda. He also attends meetings of the SCCOG Regional Water Committee, which meets only as needed. The General Manager participates on the SCCOG Regional Water Committee's Technical Advisory Subcommittee (TAS).

**d) SCWA Interaction with the Water Planning Council (WPC):** The General Manager represents SCWA as a member of the Connecticut Water Planning Council Advisory Group (WPCAG), which meets monthly. Mr. Cansler is currently Chair of the WPCAG Nominating Committee, which prepares the annual membership slate for appointment/reappointment of members to the WPCAG.

At the August meeting Mr. Cansler said that the WPC has expressed an interest in making him the co-chair of the WPCAG, representing Utilities and other interests within the state designated as Out-of-Stream water users. The Authority approved a motion authorizing Mr. Cansler to serve in the role as WPCAG co-chair, if nominated, and approved by the Water Planning Council.

**e) SCWA Interaction with AWWA and CWWA:** General Manager Cansler is also a member of the Connecticut Water Works Association (CWWA) Legislative Affairs Committee, which meets monthly between November and June.

**Other Business**

Chairman Monahan mentioned that it has been a while since the last formal written evaluation of the General Manager. He asked that Mr. Cansler send him a copy of the evaluation form that the Authority had agreed to use. Mr. Eccard also mentioned that it might be time to have CBIA conduct a salary review of the Authority staff to determine if our salary structure was compatible with our counterparts in the water utility industry. The authority asked the General Manager to contact CBIA regarding a salary study, and add this issue as a topic for the next Authority meeting.

**Report from Chairman - None**

**Report from Authority Members- None**

**Public Comment – None**

**Adjourn**

On motion of Mr. Eccard, seconded by Ms. Franciosi, the Authority voted to adjourn the meeting at approximately 6:38 p.m.

It was noted the next Authority meeting is scheduled to occur on October 21, 2019, 5:15 pm at 1649 Rt. 12, Gales Ferry, CT.

Josh Cansler  
Secretary

## ATTACHMENT 1



# Ground Water Rule: A Quick Reference Guide

## Overview of the Rule

Title	Ground Water Rule (GWR) 71 FR 65574, November 8, 2006, Vol. 71, No. 216 Correction 71 FR 67427, November 21, 2006, Vol. 71, No. 224
Purpose	Reduce the risk of illness caused by microbial contamination in public ground water systems (GWSs)
General Description	The GWR establishes a risk-targeted approach to identify GWSs susceptible to fecal contamination and requires corrective action to correct significant deficiencies and source water fecal contamination in all public GWSs.
Utilities Covered	The GWR applies to all public water systems (PWSs) that use ground water, including consecutive systems, except that it does not apply to PWSs that combine all of their ground water with surface water or with ground water under the direct influence of surface water prior to treatment.

## Public Health Benefits

Implementation of the GWR will result in ...	<ul style="list-style-type: none"> <li>▶ Targeted protection for over 70 million people served by ground water sources that are either not disinfected or receive less than 4-log treatment.</li> <li>▶ Avoidance of 42,000 viral illnesses and 1 related death annually.</li> </ul>
Estimated impacts of the GWR include ...	<ul style="list-style-type: none"> <li>▶ The annualized present value of the GWR is \$19.7 million, with a 90-percent confidence interval of \$6.5 to \$45.4 million.</li> <li>▶ Mean annual cost per household is estimated to be less than \$1.00 for approximately 96 percent of affected households.</li> </ul>

## Critical Deadlines and Requirements

### For Drinking Water Systems

November 30, 2009	New ground water sources put in place after this date must meet triggered source water monitoring requirements or conduct compliance monitoring.
December 1, 2009	By this date, GWSs conducting compliance monitoring because they provide at least 4-log virus inactivation, removal, or a state-approved combination of these technologies before or at the first customer, must have notified the state and must begin compliance monitoring. The written notification to the state must include engineering, operational, and other information the state requests.
December 1, 2009	GWSs must conduct triggered source water monitoring if the GWS does not provide at least 4-log virus inactivation, removal, or a state-approved combination of these technologies before or at the first customer and the GWS is notified that a sample collected for the Total Coliform Rule (TCR) is total coliform-positive.
December 1, 2009	GWSs for which the state has identified a significant deficiency and GWSs at which at least one of the five additional ground water source samples (or at state discretion, after the initial source sample) has tested positive for fecal contamination must comply with the treatment technique requirements.

### For States

August 8, 2008	States are encouraged to submit final primacy applications or extension requests to EPA.
November 8, 2008	Final primacy revision applications for GWR must be submitted to the EPA regional administrator, unless state is granted an extension.
August 8, 2010	States with approved extension agreements are encouraged to submit final primacy applications to EPA.
November 8, 2010	Final primacy applications must be submitted to the EPA regional administrator for states with a full 2 year extension.
December 31, 2012	States must complete initial sanitary survey cycle for all community GWSs except those that meet performance criteria.
December 31, 2014	States must complete initial sanitary survey cycle for all noncommunity GWSs and all community GWSs that meet performance criteria.

## Analytical Methods for Source Water Monitoring

Fecal Indicator	Methodology	Method Citation
<i>E. coli</i>	Collert Collsure Membrane Filter Method with M1 Agar m-ColiBlue24 Test E*Collite Test EC-MUG NA-MUG	9223 B. 9223 B. EPA Method 1604.  9221 F. 9222 G.
Enterococci	Multiple-Tube Technique Membrane Filter Technique Membrane Filter Technique Enterolert	9230 B. 9230 C. EPA Method 1600.
Coliphage	Two-Step Enrichment Presence-Absence Procedure Single Agar Layer Procedure	EPA Method 1601. EPA Method 1602.

## Major Provisions

### Compliance Monitoring

Treatment Technique Compliance Monitoring	<ul style="list-style-type: none"><li>▶ In order not to be subject to triggered source water monitoring, a GWS can notify the state that it provides at least 4-log treatment of viruses using virus inactivation, removal, or a state-approved combination of 4-log virus inactivation and removal before or at the first customer. The GWS must then begin compliance monitoring designed to show the effectiveness of their treatment processes.</li><li>▶ GWSs that use chemical disinfection and serve more than 3,300 people must continuously monitor their disinfectant concentration. GWSs must maintain the minimum disinfectant residual concentration determined by the state.</li><li>▶ GWSs that use chemical disinfection and serve 3,300 people or fewer must take daily grab samples or meet the continuous monitoring requirements described above for GWSs serving more than 3,300 people.</li><li>▶ GWSs using membrane filtration for 4-log treatment of viruses must monitor the membrane filtration process according to state-specified monitoring requirements.</li><li>▶ GWSs may use alternative treatment technologies (e.g., ultraviolet radiation [UV]) approved by the state. GWSs must monitor the alternative treatment according to state-specified monitoring requirements, and must operate the alternative treatment according to compliance requirements established by the state.</li></ul>
---	--

### Source Water Monitoring

Triggered Source Water Monitoring	<ul style="list-style-type: none"><li>▶ GWSs that do not conduct compliance monitoring and are notified of a total coliform-positive routine sample collected in compliance with the TCR (40 CFR 141.21) must conduct triggered source water monitoring;</li><li>▶ GWSs must collect at least one ground water source sample from each source in use at the time the total coliform-positive sample was collected. The triggered source water sample must be analyzed for the presence of a fecal indicator as specified in the rule.</li><li>▶ If the triggered source water sample is fecal indicator-positive, the GWS must either take corrective action, as directed by the state, or if corrective action is not required by the state and the sample is not invalidated by the state, the GWS must conduct additional source water sampling.</li><li>▶ States may waive the triggered source water monitoring requirement if the state determines and documents, in writing, that the total coliform-positive routine sample is the result of a documented distribution system deficiency.</li><li>▶ States may develop criteria for distribution system conditions that cause total coliform positive samples. A GWS can document to the state that it met the state criteria within 30 days of the total coliform-positive sample and be exempt from collecting triggered source water sample(s).</li><li>▶ States may invalidate a fecal indicator-positive ground water source sample under specific conditions. If a fecal indicator-positive source sample is invalidated, the GWS must collect another source water sample within 24 hours of being notified by the state of its invalidation decision.</li></ul>
Additional Source Water Sampling	<ul style="list-style-type: none"><li>▶ If the state does not require corrective action in response to a fecal indicator-positive triggered source water sample, the GWS must collect five additional source water samples (from the same source), using the same indicator as used in triggered source water monitoring, within 24 hours of being notified of the fecal indicator-positive sample.</li></ul>
Assessment Source Water Monitoring	<ul style="list-style-type: none"><li>▶ States have the opportunity to target higher risk GWSs for additional testing. States independently can determine on a case by case basis whether monitoring is necessary and when corrective action needs to be taken.</li></ul>

### Treatment Technique Requirements

GWSs with Significant Deficiencies or Source Water Fecal Contamination	<ul style="list-style-type: none"><li>▶ GWSs must take corrective action if a significant deficiency is identified, or if the initial source sample (if required by the state) or one of the five additional ground water source samples tests positive for fecal contamination. The GWS must implement at least one of the following corrective actions:<ul style="list-style-type: none"><li>▶ Correct all significant deficiencies.</li><li>▶ Provide an alternate source of water.</li><li>▶ Eliminate the source of contamination.</li><li>▶ Provide treatment that reliably achieves at least 4-log treatment of viruses (using inactivation, removal, or a state-approved combination of 4-log virus inactivation and removal) before or at the first customer for the ground water source.</li></ul></li></ul>
--	--

### New Sources

New Ground Water Sources	<ul style="list-style-type: none"><li>▶ New sources which come on line after November 30, 2009 are required either to conduct triggered source water monitoring as required by the GWR, or provide at least 4-log inactivation, removal or a state-approved combination of these technologies and conduct compliance monitoring within 30 days of the source being put in service.</li></ul>
--------------------------	--

### Sanitary Surveys

All Ground Water Systems	<ul style="list-style-type: none"><li>▶ States are required to conduct sanitary surveys of all GWSs in order to identify significant deficiencies, including deficiencies which may make a system susceptible to microbial contamination.</li><li>▶ Following the initial sanitary survey, states must conduct sanitary surveys every 3 years for most CWSs and every 5 years for NCWSs and CWSs that provide at least 4-log treatment of viruses or have outstanding performance records, as determined by the state.</li></ul>
--------------------------	--

For additional information on the GWR

Call the Safe Drinking Water Hotline at 1-800-426-4791; visit the EPA web site at [www.epa.gov/safewater/disinfection/gwr](http://www.epa.gov/safewater/disinfection/gwr); or contact your state drinking water representative.

## ATTACHMENT 2

# The Bulletin

---

## **Audit of Montville WPCA shows an agency without oversight**

By John Penney

[jpenney@norwichbulletin.com](mailto:jpenney@norwichbulletin.com), (860) 857-6965

Posted Aug 24, 2019 at 10:27 AM

Updated Aug 24, 2019 at 6:02 PM

MONTVILLE – An audit of the Montville Water Pollution Control Authority found instances of policies ignored, inappropriate purchasing and a lack of financial oversight.

The audit report, released late Friday, comes months after WPCA Chairman and Town Councilor Jeff Rogers announced state police detectives were investigating allegations of “inappropriate purchasing” by members of the authority.

In an emailed statement released at 10 p.m. on Friday, Rogers said he met with WPCA Superintendent Derek Albertson earlier this year and, concerned over the lack of an in-depth audit of the agency’s finances, ordered Albertson to provide a detailed list of specific expenses incurred for the 12 months beginning in Nov. 1, 2017.

The full audit report, also released Friday, was sought earlier this year by The Day newspaper under a Freedom of Information Act request, but was initially deemed “not releasable” under FOI exemptions. Rogers said he was notified by investigators that the audit, conducted by the PFK O’Connor Davies accounting firm and submitted on June 3, could be publically disseminated.

The audit, which examined the WPCA’s accounting practices, internal control mechanisms, along with specific ledger and other transactions, found several issues, including invoices paid and credit card purchases made without supporting documentation, approval or oversight.

Auditors found a “significant number” of instances in which accounts were charged inappropriately and inconsistently as “miscellaneous” expenses, including restaurant disbursements.

WPCA bid policies, which require purchases above \$5,000 to first receive three quotes and purchases more than \$10,000 to go through a formal bid process, were not followed, the report states.

An analysis on the use of the WPCA's two credit cards, set aside for the group's administrator and accountant, found the use of the charge cards came with no stated use policy and the majority of purchases charged did not come with adequate supporting documentation.

"In certain instances, we were not able to determine what the purchase was for," the auditors wrote.

Auditors found the WPCA accountant, Maureen Benway, was reimbursed for cell phone use at a rate of \$720 a year and in one instance for clothing – neither a usual practice. Travel expenses for a three-night conference stay in Texas by Benway were also scrutinized and "appeared to be higher than would be expected," though no back-up documentation was submitted related to the trip.

In a review of credit card receipts for restaurant purchases, auditors found lunch was purchased on several occasions for vendors/engineers, a possible violation of standard business ethics policies.

An exhibit detail breaking down \$12,692 worth of restaurant credit card activity from August 2014 to June 2018 – including meals at Mohegan Sun Casino, Chili's in Montville and other local eateries - was accompanied in most instances with the same statement in the auditors' comment section: "No documentation on who was present or the purpose of this expense."

In one instance, auditors found WPCA members on June 12, 2018 tipped \$275 for a \$623.21 meal at Bobby Flay's Bar Americain – a 44.13% tip.

The auditors found there is "no formal reporting process for financial operations" to either the group's superintendent or board and no "clear roles or responsibilities" for administrative staff.

"This includes proper reporting, review and approval of purchase orders, review and approval of invoices, approval of adjustments and other proper internal controls over the financial operations and activity of the WPCA," the report states.

Among their many recommendations, auditors pushed for the town's finance director to supervise the WPCA's financial operations, the creation of a formal fraud policy and to allow the WPCA's superintendent and town's finance department to have access to the group's general ledger.

## ATTACHMENT 3



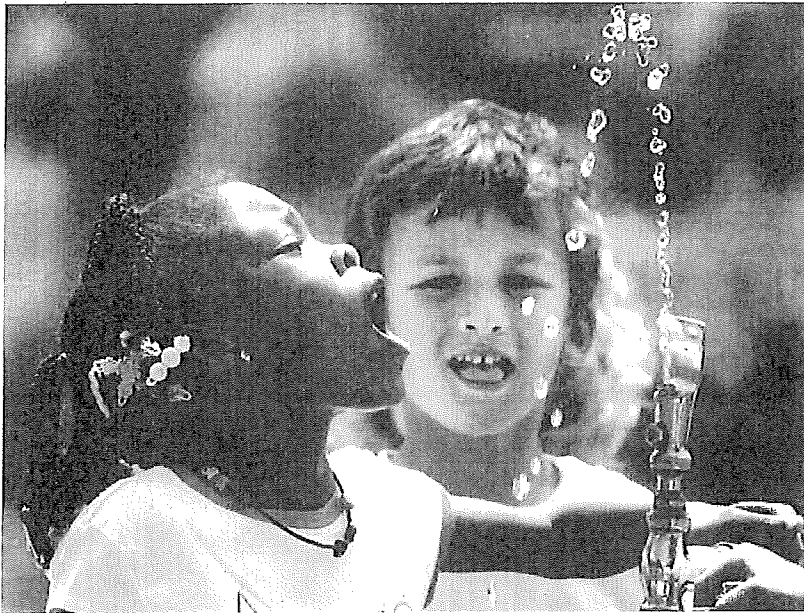
Pot Infused Drink Stock  
stockstreetnews.com



VISIT SITE

## Study linking mother's fluoride exposure to lower IQ scores in kids raises questions

Ken Alltucker, USA TODAY Published 1:14 p.m. ET Aug. 19, 2019



Young children whose mothers consumed higher levels of fluoride while pregnant scored slightly lower on IQ scores than their peers, according to a new study in a medical journal. (Photo: Bill Hughes, AP)

Young children whose mothers consumed higher levels of fluoride while pregnant scored slightly lower on IQ scores than their peers, according to a new study.

The study, published Monday in *JAMA Pediatrics*, used two measures to evaluate the amount of fluoride that women in six Canadian cities consumed during pregnancy. When their children ages 3 and 4 were given cognitive tests, researchers reported a small drop in IQ scores among kids whose moms had higher levels of fluoride exposure when pregnant.

ADVERTISEMENT



Replay



Still, experts not involved in the limited observational study say that one research paper should not change public policy on the widespread use of community fluoridated water, long a subject that has stirred public debate.

For one, the study's design could not rule out other factors that might affect cognitive scores.

The peer-reviewed journal's editor, Dimitri Christakis, acknowledged the controversial nature of the study in an editor's note that accompanied the study. In the note, Christakis said the study was subject to extra scrutiny for its methods and findings.

"This study is neither the first, nor will it be the last, to test the association between prenatal fluoride exposure and cognitive development," Christakis wrote in the editor's note. "We hope that purveyors and consumers of these findings are mindful of that as the implications of this study are debated in the public arena."

Brittany Seymour, a Harvard School of Dental Medicine assistant professor of public policy, said more research is needed to determine the possible health effects, if any, of prenatal exposure to fluoride.

"We always want to be cautious and take our time to allow additional peer review," Seymour, an American Dental Association spokesperson, told USA TODAY. "Can these findings be replicated to find out if they have any weight?"

Most U.S. residents get fluoridated tap water from public water systems. The Centers for Disease Control and Prevention described community water fluoridation as one of the top 10 public health achievements of the 20th century (<https://www.cdc.gov/fluoridation/index.html>) for reducing cavities and improving oral health.

### **Get the News Alerts newsletter in your inbox.**

Get alerted to the latest stories to stay on top of the news.

Delivery: Varies

Your Email



More than one-third of Canadian residents get fluoridated tap water, while a small percentage of European residents do.

Christine Till, an associate professor at York University and the study's senior author, said her research team's goal was to provide new data on the effects of prenatal exposure to fluoridated water. She noted her team's study followed a 2017 study in Mexico that also linked prenatal exposure to lower IQ scores.

"It is our hope that our findings – and all the other studies that are done – are used to inform policy," Till said. "The question now becomes how will the policymakers weight the risks and benefits," of fluoride in public water systems.

Till's research team examined women and children in six of Canada's largest cities: Vancouver, Montreal, Kingston, Toronto, Hamilton and Halifax. The children lived in communities within those metro regions that either had or did not have fluoridated water systems.

Researchers used two measures of fluoride exposure: Urine samples collected as part of a previous research project and self-reports of tap water, black tea or coffee the women consumed while pregnant.

The research team obtained the frozen urine samples from the Maternal-Infant Research on Environmental Chemicals, a Canadian study that examined births from 2008 to 2012.

Among the 512 women who provided three urine samples during pregnancy, researchers said a 1 milligram-per-liter increase in fluoride in the mother's urine was associated with a 4.5-point drop in IQ tests among boys, but not girls.


The other test evaluated self-reported data from 400 mothers who drank fluoridated tap water, black tea or coffee. Among mothers in that group, the study found a 1 milligram-per-liter increase in fluoride intake was associated with a 3.7-point decrease in IQ scores among boys and girls.

In an accompanying editorial, Boston Children's Hospital researcher David Bellinger noted that the study raises questions such as whether boys face greater risk than girls (<https://media.jamanetwork.com/wp-content/handlers/downloader.php?a=54825>) or if prenatal period is the most critical window of exposure. The study does not address how fluoride might affect children after birth.

"Therefore, these studies do not provide any guidance regarding the management of children's postnatal exposures to fluoride, such as the age at which fluoride toothpaste should be introduced and the quantity that should be applied to a child's brush at different ages," Bellinger said.

Still, despite the study's limitations, Bellinger said that researchers must give "serious consideration" to the hypothesis that fluoride might be a neurodevelopmental toxicant, and that more research is needed to conclude whether there are any public health implications.

Read or Share this story: <https://www.usatoday.com/story/news/nation/2019/08/19/fluoride-exposure-pregnancy-linked-childrens-iq-scores/2049355001/>



USA TODAY **Can we have a word with you?** Try our free crossword app [Download Now](#)

ATTACHMENT 4



## **COST PROPOSAL** (PRICING GOOD FOR 90 DAYS FROM 8/27/2019)

Keep staff and residents safe and informed with the CodeRED system with the quick notifications of time-sensitive information, emergencies and day-to-day operational updates. Send targeted emergency and community notifications to mobile subscribers located in specific geographic areas within your jurisdiction.

**A three (3) year license includes 24/7/365 uninterrupted CodeRED system access and the following:**

- CodeRED system set-up and training
- Unlimited calling
- Unlimited text, email, mobile app and social media messaging
- Unlimited users
- Onsolve supplied data
- Integration and geo-coding of customer supplied data (911 data, utility data, etc.)
- OnSolve standard mapping and geo-coding
- Two-way messaging
- 24/7 technical support
- Complimentary system time for testing and training
- Design and hosting of custom Web page for community enrollment

**\$4,000 = Annual Cost**

(Based on up to 3,000 customers)

A further discount may be obtained by committing to an extended contract term.

Thank you for the opportunity to present CodeRED and submit this cost proposal to your agency. If you have any questions, please feel free to contact me directly.

ATTACHMENT 5

**GRANT OF PERMANENT EASEMENT**

This easement grant is made by the Town of Ledyard, County of New London and State of Connecticut, hereinafter referred to as the Grantor, to the Southeastern Connecticut Water Authority, a quasi-municipal corporation located in the County of New London and State of Connecticut, hereinafter referred to as Grantee for the consideration of ONE DOLLAR (\$1.00) and other valuable consideration, the receipt of which is hereby acknowledged.

1. The Grantor hereby grants to the Grantee the perpetual and exclusive easement over and across the Grantor's easement premises particularly described in Schedule "A" attached hereto for the purposes of construction, alteration, operation, repair, replacement and maintenance of a well and pump, and other appurtenances which may now or hereafter be within the easement premises.

2. The Grantor further grants and releases and conveys to the Grantee the permanent right of access to the easement premises whenever, from time to time, it shall be necessary or desirable for the Grantee to construct, alter, repair, replace or maintain the well and pump facilities located therein. Access to said easement premises shall be made in a manner so as to do as little damage to the Grantor's remaining land as possible and further provided that the Grantee shall restore said easement premises, and any remaining land of Grantor affected by access to or use of the easement premises, to a neat and presentable condition as soon as practicable after any construction, maintenance or repair.

3. The Grantor and its heirs and assigns shall only have the right to make such use of the easement premises which do not in any way interfere with the purposes for which this easement is granted.

4. This grant of easement is a covenant running with the land of the Grantor and is binding upon the Grantor and his heirs and assigns, and all future owners or occupants of said land.

**TO HAVE AND TO HOLD**, the aforesaid premises unto the said Grantee and its successors and assigns for the uses and purposes set forth above.

**IN WITNESS WHEREOF**, I have hereunto set my hand and seal this \_\_\_\_ day of May, 2019.

Signed, Sealed and Delivered in the Presence of:

\_\_\_\_\_  
(Grantor)

\_\_\_\_\_

STATE OF CONNECTICUT } ss: Ledyard May \_\_\_\_, 2019  
COUNTY OF NEW LONDON

Personally appeared, \_\_\_\_\_, signer and sealer of the foregoing instrument and he acknowledged the same to be his free act and deed, before me.

\_\_\_\_\_  
Commissioner of the Superior Court

TOWN OF LEDYARD

TO

THE SOUTHEASTERN CONNECTICUT WATER AUTHORITY

A certain easement of land situated on the westerly side of Fairway Drive in the Town of Ledyard, County of New London, and State of Connecticut, said easement is shown over 740 Colonel Ledyard Highway as shown on a plan entitled "MUNICIPAL LOT SPLIT PLAN PROPERTY OF THE TOWN OF LEDYARD 740 COLONEL LEDYARD HIGHWAY A.K.A. CONNECTICUT ROUTE 117 LEDYARD, CONNECTICUT SCALE 1"=40' APRIL 2019", said plan to be filed in the Ledyard Town Clerk's office, said parcel bounded and described as follows:

Beginning at a point in the westerly line of Fairway Drive marking the southeast corner of the herein described easement, the northeast corner of other land of the Town of Ledyard;

Thence running S 72°-00'-31" W, 389.82 feet to a point marking the southwest corner of the herein described easement, the northwest corner of other land of the Town of Ledyard;

Thence running N 21°-19'-33" W, 315.00 feet to the northwest corner of the herein described easement;

Thence running N 73°-03'-33" E, 388.20 feet to a point marking the northeast corner of the herein described easement in the westerly line of Fairway Drive;

Thence running S 21°-42'-29" E, 308.00 feet along the westerly line of Fairway Drive to the point and place of beginning.

ATTACHMENT 6



STATE OF CONNECTICUT  
DEPARTMENT OF PUBLIC HEALTH



Raul Pino, M.D., M.P.H.  
Commissioner

Dannel P. Malloy  
Governor  
Nancy Wyman  
Lt. Governor

Drinking Water Section

April 17, 2017

John Vitale  
Member  
Thames Aquatic Club, LLC  
405 Pine Hill Road  
Moosup, Connecticut 06354

PUBLIC WATER SYSTEM: Thames Aquatic Club  
TOWN: Ledyard  
CLASSIFICATION: NTNC  
DPH PROJECT NUMBER: 2016-0252

RE: CPCN Phase I-A Well Site Suitability Certification for Well #1 – Approved withdrawal rate of less than ten gallons per minute

Dear Mr. Vitale:

In accordance with the attached Notice of Well Site Suitability Certification and pursuant to the authority of Connecticut General Statutes (CGS) Section 25-33(b) and Regulations of Connecticut State Agencies (RCSA) Section 19-13-B102(d)(2) Well #1 has been inspected and found to be suitable for drilling a well with a withdrawal rate of less than ten (10) gallons per minute (gpm) at the location specified in the application. This site, as proposed, presently meets the requirements of RCSA Section 19-13-B51d(a) and CGS Section 25-33(b) according to the information provided in the well site application. At the time of the well site application, information provided by the applicant did not identify any known sources of pollution nor identified any concerns with the well location. Well #1 is subject to the enclosed terms of the well site review.

A copy of the attached Well Site Suitability Certification must be provided to the well drilling contractor prior to drilling and construction of the well. The Public Water System will be fully responsible for maintaining the sanitary conditions within the 75 foot sanitary radius of this proposed well. Any changes affecting the sanitary conditions within the sanitary radius for the proposed well may lead to a revocation of this site suitability approval. This Well Site Suitability Certification does not relieve the public water system of its responsibility to comply with other applicable federal, state and local laws.

CGS Section 25-33(i) mandates that no public water supply system may be approved within a public water supply management area after the Commissioner of Public Health has convened a water utility coordinating committee unless an existing public water supply system is unable to provide water service or the committee recommends such approval. Southeastern Connecticut Water Authority (SCWA) has indicated that they can provide water to the 14 Iron Street parcel upon completion of an expected water main extension. Given the timing of this project, SCWA will operate this public water system until the



Phone: (860) 509-7333 • Fax: (860) 509-7359  
410 Capitol Avenue, P.O. Box 340308  
Hartford, Connecticut 06134-0308  
[www.ct.gov/dph](http://www.ct.gov/dph)

*Affirmative Action/Equal Opportunity Employer*



John Vitale  
April 17, 2017  
Page 2

main extension is completed. When the main extension is completed, the applicant shall connect to SCWA's water main within 90 days.

Components of the required water quality monitoring conducted on this well as part of the approval process will indicate the potential corrosivity of the water. If the department determines that a significant potential exists for elevated lead and/or copper levels, corrosion control treatment will be required prior to final approval of this well.

When this source is approved for use, the water system will be required to conduct routine distribution tap monitoring for lead and copper every six months to demonstrate optimum corrosion control in the distribution system. Your water quality monitoring schedule will be updated at that time to reflect this change

**Please be reminded that this approval is not the final approval of the CPCN. You must seek and obtain Phase I-B and Phase II approvals from DPH before you can construct the new public water system.**

The Department of Public Health (DPH) has completed its review of your Phase I-A application for a "Certificate of Public Convenience and Necessity" (CPCN) and has hereby granted its approval of this phase by issuing the Well Site Suitability Certification.

Should you have any questions or concerns regarding the Phase I-A approval, please contact Justin Milardo of this office.

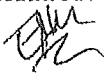
Sincerely,



Lori J. Mathieu  
Public Health Section Chief  
Drinking Water Section

Cc: Doug Hoskins, DEEP  
Tom Chyra, DPH  
Michael Finkelstein, Mayor, Town of Ledyard  
Stephen Mansfield, Director of Health, Ledge Light Health District  
Josh Cansler, SCWA  
Bob Congdon, Eastern WUCC Co-Chair  
Mark Decker, Eastern WUCC Co-Chair  
Pat Bernardo, Eastern WUCC Co-Chair  
Sam Alexander, Eastern WUCC Recording Secretary

**NOTICE OF WELL SITE SUITABILITY CERTIFICATION**

**FROM:** Justin Milardo, Environmental Analyst   
**DATE:** April 17, 2017  
**DATE OF SITE VISIT:** April 13, 2017  
**VISITED WITH:** John Vitale, Thames Aquatic Club; Anne Vitale, Thames Aquatic Club  
**SUBJECT:** Well Site Review: Well #1  
**TOWN:** Ledyard  
**DPH Project #:** 2016-0252  
**NEED FOR SUPPLY:** The 14 Iron Road parcel is currently under vacant, and, when completed, will be the location of an aquatic club. Well #1 will be the sole source of supply for this parcel.

Background Information	
Public Water System Or Owner	Thames Aquatic Club
Consultant	Robert Schuch, P.E.
Site Location	14 Iron Street, Ledyard
Licensed Well Driller	TBD
Type Of Well Proposed	Bedrock
Proposed Withdrawal Rate	Less than 10 gallons per minute
Existing Topography	The site slopes gently to the ENE
Groundwater Quality Of Aquifer	GA
Adjacent Well Locations	None on-site
Nearby Wells required to be tested per CGS Section 25-33(b) and CGS Section 16-262(m)(e)(1)(G)	Refer to #10 under terms of the well site review for recommendations to monitor private and public wells nearby the proposed Well #1 for interference.
Source Water Area	18 acres
Ownership or Control of Sanitary Radius	The 75 foot sanitary radius will be owned by Thames Aquatic Club.
Groundwater Under The Direct Influence of Surface Water Study	Not Required
DEEP Contacted On	By way of this document
Map Information	"Vitale Aquatic & Tennis, A Proposed Recreational Facility, prepared for Thames Aquatic Club, LLC, Property of Iris Holding Company, LLC 14 Iron Street, Ledyard Connecticut" (6 sheet plan set) prepared by Schuch Engineering, LLC and dated February 2017.
GPS Points	Lat: N 41.446044 Lon: W -72.015690

Sources Of Pollution In Area per RCSA 19-13-B51	Distance (feet)	Compass Heading
Subsurface Sewage System Tank	103	E
Subsurface Sewage System Piping	80	E
Storm Drain	171	NE
Foundation Drain	33	E
Dry Well	NA	---
High Water Mark for Surface Water Body	NA	---
Liquid Fuel Storage Tank/Piping	NA	---



### TERMS OF THE WELL SITE REVIEW

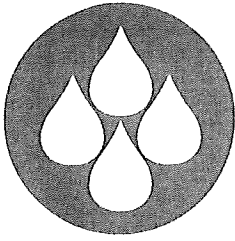
1. The well must be constructed and completed in accordance with the Regulations of Connecticut State Agencies (RCSA) Sections 19-13-B51 (a) through (l) and the Connecticut Well Drilling Code Sections 25-128-33 through 25-128-64.
2. Thames Aquatic Club, LLC is a non-community water system that once constructed will own the water system and Well #1.
3. The location of the proposed well, as noted on the plans dated February 2017, provided with the Application for Well Site Suitability Certification, cannot be altered. The applicant must provide as-built drawings prior to the Department approving the well for use as a public water supply.
4. This office must be notified immediately in writing of any pollution, spills, or any change to the sanitary conditions or the sources of pollution within the recharge area of the proposed well prior to drilling. This information may lead to a modification of this well site suitability review. Drilling must be carried out by a licensed well driller in a manner which prevents contamination of the groundwater aquifer. Any contamination identified or caused in the groundwater recharge area during the drilling operation must be reported to this office in writing.
5. This Well Site Suitability Certification is valid until October 17, 2017. If the well is not drilled by this date the approval expires, and a new well site application must be provided to this office for review. In that case, a new written review must be issued by this office prior to well development.
6. The well must be constructed and completed in accordance with the Drinking Water Section's "General Terms for Well Site Development." This document can be obtained via the Drinking Water Section's web-site: [http://www.ct.gov/dph/LIB/dph/drinking\\_water/pdf/general\\_terms.pdf](http://www.ct.gov/dph/LIB/dph/drinking_water/pdf/general_terms.pdf) It is the responsibility of the applicant to review and follow the conditions outlined within this document.
7. Components of the required water quality monitoring conducted on this well as part of the approval process will indicate the potential corrosivity of the water. If the department determines that a significant potential exists for elevated lead and/or copper levels, corrosion control treatment will be required prior to final approval of this well.
8. When this source is approved for use, the water system will be required to conduct routine distribution tap monitoring for lead and copper every six months to demonstrate optimum corrosion control in the distribution system. Your water quality monitoring schedule will be updated at that time to reflect this change.
9. Thames Aquatic Club, LLC must maintain full ownership and/or control of the entire sanitary radius of proposed Well #1. The edge of the sanitary radius appears to be in close proximity to the property line on the site plans.
10. CGS Section 25-33(b) mandates that in the development of new sources of public water, the potential impact to other water supplies be evaluated; please identify and arrange to monitor public or private wells within, minimally, 500 feet of proposed Well #1. Based on our public water supply database, the closest public water supply well is approximately 750 feet to the southwest. Private well information may be obtained through the local health department.



11. CGS Section 25-33(i) mandates that no public water supply system may be approved within a public water supply management area after the Commissioner of Public Health has convened a water utility coordinating committee unless an existing public water supply system is unable to provide water service or the committee recommends such approval. Southeastern Connecticut Water Authority (SCWA) has indicated that they can provide water to the 14 Iron Street parcel upon completion of an expected water main extension. Given the timing of this project, SCWA will operate this public water system until the main extension is completed. When the main extension is completed, the applicant shall connect to SCWA's water main within 90 days.

*EDM*

ATTACHMENT 7



September 9, 2019

Ms. Lori Mathieu, Chief  
Drinking Water Section  
Department of Public Health  
410 Capitol Avenue  
Hartford, CT 06134-0308

RE: CPCN Phase 1-A Well Site Suitability Certification for Well #1 – Approved withdrawal rate of less than ten gallons per minute.

Dear Ms. Mathieu,

On April 17, 2017 DPH sent a letter to the developers of the Thames Aquatic Club, LLC in Ledyard regarding approval of their well application. Your letter stated that Well #1 had been inspected and found suitable for drilling a well with a withdrawal rate of less than ten (10) gallons per minute (GPM) at the location specified in the application.

In the same letter you state that “Southeastern Connecticut Water Authority (SCWA) has indicated that they can provide water to the 14 Iron Street parcel upon completion of an expected water main extension. Given the timing of this project, SCWA will operate this public water system until the main extension is completed”. The water main extension referred to in this letter was to be constructed when a proposed project by the Town of Ledyard connecting Fairway Drive to Route 117 is completed. To our knowledge there is no timeline for this project.

After the Thames Aquatic Club was completed, our General Manager, Josh Cansler, reached out to DPH regarding the status of the Aquatic Club’s well approval and operation. Mr. Cansler was informed by Chris Urena at DPH that due to the Aquatic Club’s small full-time staffing requirements, DPH designated the Aquatic Club as Transient Non-Community facility. We were told this meant the Club is not required to have a certified operator.

Since the Aquatic Club is in the SCWA Exclusive Service Area (ESA), and your April 17, 2017 letter states SCWA will operate this public water system until the main extension is completed, SCWA is concerned that we are still responsible for operation of their well, and therefore possibly liable for any violations that could potentially occur during the operation, maintenance, and monitoring of their well. The Authority kindly requests DPH provide clarification regarding the SCWA’s responsibilities for the operation of the well at the Thames Aquatic Club.

Sincerely yours,

Edward C. Monahan, Ph.D., D.Sc.  
Chairman

Cc: Josh Cansler, SWCA General Manager  
Members, SCWA Authority Board