

## Memorandum

то: Graham Stevens, CT DEEP

Co-Chair Senator Rick Lopes, CT Legislature Committee on the Environment

Co-Chair Representative Joseph P. Gresko, CT Legislature Committee on the Environment

Co-Chair Representative Eleni Kavros DeGraw, CT Legislature Committee on Planning & Development

Co-Chair Senator MD Rahman, CT Legislature Committee on Planning & Development

From: Scott W. Jellison, P.E., MDC

Date: January 31, 2024

Re: MDC Public Act No. 23-204 / House Bill No. 6941 Monthly Report – January 2024

cc: Chris Levesque, P.E., MDC Susan Negrelli, P.E., MDC Michael Curley, P.E., MDC Jason Waterbury, P.E., MDC

Mary Manning, P.E., MDC
Dave Rutty, MDC
Todd Cormier, MDC
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Nisha Patel, CT DEEP
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Stacy Pappano, CT DEEP
Ann Straut, CT DEEP

The purpose of this memorandum is to provide a monthly report to CT DEEP and the State General Assembly's Environment Committee and Planning and Development Committee on the below three items:

- a description of any repairs and improvements begun or completed in the previous month under the program developed pursuant to this section;
- an itemized accounting of expenditures relating to such repairs and improvements; and
- a list of any repairs and improvements that the district has begun but has been unable to complete due to permitting issues, and the nature of any such issues. The initial report submitted pursuant to this subsection shall additionally include a detailed description of the scope of all projects the district anticipates undertaking pursuant to the program and an

estimated schedule for commencement and completion of each project. After submitting such initial report, the district shall not be required to submit a report for any month in which it did not undertake repairs or improvements pursuant to such program.

## **Background:**

As the MDC has stated previously, recent public concerns were centered primarily on street flooding. The MDC's planned Separation work will have some benefits to reducing street flooding, primarily in storms up to and including storms of 10-years in return frequency (CT DOT Design Standard). This separation will not have any benefits in decreasing street flooding if the City of Hartford (COH) and/or CT DOT does not properly maintain its streets and clear roadways of debris. As documented by the MDC previously, if this debris is not removed, it will collect on the surface of catch basins, blocking stormwater from entering that road's storm drains or combined sewer. Failure to properly clear streets of debris is a violation of MS4 obligations, as this debris eventually make its way to a surface water body via storm drains, or clog the storm drains and exacerbate street flooding. Therefore, without removing this variable from the equation, it makes it impossible to determine whether MDC's work and its capital expenditures incurred are mitigating impacts of street flooding.

Additionally, US EPA recently recognized the deficiencies in the overall compliance of the MS4 General Permit by letters to the COH and the MDC setting forth each entity's responsibilities in the MS4 General Permit. In response, the MDC and the COH are committed to and aggressively working together to finalize a previous Memorandum of Understanding (MOU) and specifically delineating MS4 roles and responsibilities. Fulfilling MS4 obligations is critical. For example, as evidenced by a July 4, 2023 150-year storm rain event, as a result of proper street management and cleaning, there were no reports of street flooding in North Hartford.

Given the fact that there are portions of the MDC's combined sewer system that may not be able to convey system inflows during a 10-year storm, the function of the CSO regulators is to provide the necessary relief where the collection system is overwhelmed. In many cases, there may be street flooding with no private property basement sewage backups. This is a clear indication that that the MDC collection system is not surcharged and therefore not a cause of or aggregating factor to street flooding. Additionally, as part of the recently revised and approved LTCP/IP approach, particularly the general concept to proceed with sewer separation throughout the COH, any such separation project will be designed to a 10-year storm level of service (LOS). Moving forward, this approach will provide assurances that all COH streets with drainage are provided with this LOS.

With the number of extreme rain events that have occurred over the past few years, one could argue that greater than a 10-year LOS should be required in flood prone areas. For comparison, it is estimated that this would cost up to \$5B for the required upgrades to the collection system to achieve as 50-year storm LOS These upgrades would only include the MDC's collection system.

In any case, MDC and the COH together will find a solution to improve the living conditions of our residents and customers for the future.

## January 2024 Report:

As shown on Table 1, attached, for the month of December 2023, the MDC completed the following improvements to its existing collection system:

- 9,698 LF of CIPP rehabilitated combined or sanitary sewers
- 51 top hats installed, rehabilitating the connection point between a house connection ("sewer lateral") and the mainline sewer
- 15 Point Repairs
- 368 LF of new storm drains, thereby increasing the portion of the collection system that is separated

As shown on Table 1, attached, In the month of December, the MDC completed the following improvements to its existing private property assets:

- 187 sewer laterals inspected
- 6 sewer laterals replaced
- 4,349 LF of sewer laterals rehabilitated with a CIPP liner, representing 130 properties
- 44 properties with surcharge protection devices installed (i.e. backwater valves, sump pumps, etc.)
- 8 properties with internal groundwater or stormwater disconnections completed

As shown on Table 1, attached during the month of December, the MDC expended \$4,239,815 on collection system and private property improvements that will benefit the residents of Hartford. It should be noted that this value is expenditures paid, and due to invoicing schedules, does not directly correlate to work performed in December 2023. Additionally, expenditures on the South Hartford Consolidation and Storage Tunnel (Contract 2, 3, and 5) are not included.

Finally, as of December 31, 2023, the MDC is currently waiting for 117 permit approvals for work that will protect residents from sewer/stormwater backups and remove excess flows from the system. The removal of this excess stormwater or groundwater from connections to the MDC's collection system is a key component in reducing surcharges in the MDC's collection system. **Table 2** (attached) summarizes the private property permits that are pending municipal approval.



Table 1: Summary of Repairs, Improvements, and Expenditures
Public Act No. 23-204 / House Bill No. 6941 Monthly Report for
December 2023

Project	Senaratic -	The state of the s	in Gully Brook Area	Sewer Rehabilitation in Bloomfield & NBPR Area (2022	Sewer Rehabilitation in Bioomfield & NBPR	Packwater Volve/Private	House Connection Program	
Mainline CIPP (LF)	2,548	6,268	34	492	356	0	0	9,698
Tophat (EA)	51	0	0	0	0	0	0	51
Sewermain removal and replacement (LF)	0	0	0	0	0	0	0	0
Sewer lateral replacement (EA)	1	0	0	0	0	0	5	6
Sewer laterals inspected (EA)	58	67	0	0	0	62	0	187
Sewer lateral lining (EA)	58	67	0	0	0	0	5	130
Sewer lateral lining (LF)	1,643	2,499	0	0	0	0	207	4,349
Point repairs (EA)	14	1	0	0	0	0	0	15
New storm main (LF)	368	0	0	0	0	0	0	368
New starm lateral (EA)	0	0	0	0	0	0	0	0
Backwater valve/surcharge protection (# of properties)	0	0	0	0	0	44	0	44
Private property internal disconnect (# of properties)	0	0	0	0	0	8	0	8
Expenditures	\$1,282,566	\$355,396	\$72	21.786	\$1,282,425	\$597,6	542	\$4,239,815



## Table 2: Pending Private Property Permits Public Act No. 23-204 / House Bill No. 6941 Monthly Report for December 2023

Town	Number of Permits Pending Approval				
Hartford	66				
West Hartford	34				
Windsor	14				
Newington	3				
Total	117				