



May 5, 2025

Ms. Liz Burdick
Director of Land Use & Planning
Town of Ledyard
741 Colonel Ledyard Highway
Ledyard, CT 06339

RE: 19, 29, 39 Military Hwy. Gales Ferry
IWWC #25-5 Site
Job #01219

Dear Ms. Burdick:

We are responding to the latest information received concerning the Proposed Wastewater Management Plan for the above referenced application.

We have examined the following listed materials submitted concerning the subject matter.

- CTDEEP application dated May 4, 2024
- Epic Cleantec Drawings, latest revised 5/13/2024, noted as permit submittal
- Enclosure DD - Septic Dispersal Area Mounding Analysis Report, Dated May 13, 2024.
- Video recording of Richard Ross's testimony at the hearing of April 22, 2024.

As a general comment, there has been no update in the CTDEEP application or the plans prepared by Epic Cleantec to reflect the most recent changes noted in their letter of February 20, 2025 or to reflect the most recent site plan revisions prepared by Bohler.

The CTDEEP application is deficient in satisfying the travel time requirements of 21 days for pathogens and bacteria. Page 8 in Enclosure DD states the travel time to the property line is 3 days. Statutory points of concern include not just wetlands and watercourses, but also property lines. Mr. Ross testified at the April 22 hearing that travel time is exempt based on the type of treatment being proposed for the project. This is an inaccurate statement, as there are no exemptions to the CTDEEP standards, especially for a new project. Any changes to the standards would require a policy change within the agency. This may be the case in California, but not in Connecticut.

There are numerous issues with the CTDEEP application and, based on my long experience with CTDEEP and the technical requirements of the 2006 manual for Large Scale On-site Wastewater Systems, this application is grossly deficient and more than likely will be denied by CTDEEP for various technical deficiencies. The mounding analysis is just one example that does not satisfy any of the technical standards within Sections 6-8. It is evident Epic Cleantec completely ignored any the hydraulic conductivity data published by the geotechnical engineer when completing its borings. Groundwater flow paths appear to act radially, and a simple two dimensional analysis is not appropriate under these circumstances to evaluate the impact of mounding growth and travel time.

Until the applicant cures the CTDEEP application issues, no further comments are warranted at this time.

Very truly yours

A handwritten signature in black ink, appearing to read "Mark E. Lancor". The signature is fluid and cursive, with the first name "Mark" being the most prominent.

Mr. Mark E. Lancor, P.E.
Principal