



**Town of Greenwich
Dept. of Public Works
Sewer Division
Interoffice Correspondence**

Date: November 4, 2021

To: Katie Deluca, Director, Planning & Zoning

From: Richard C. Feminella, Wastewater Division Manager *RCF*

Copy: Chris Mandras, Maintenance Manager - Sewer Division
Al Romano, Environmental Asset Engineer – Sewer Division

Re: PLPZ202100394: 270 Lake Avenue, Chabad Lubavitch of Greenwich

We have prepared the following comments and questions regarding the proposed application.

Project Summary:

- Proposed use of the former Carmel Academy property for a pre-school program.

Sewer Division Comments:

Comments to be addressed during P&Z phase:

- Based on a review of the Sewer Division files, this property was originally inspected in 2004 and dye tested in 2007 which found a sump pump and floor drain connected to the sewer in "Building 3". The property was inspected again in 2011 and additional undetermined sources were found. Additional investigations are required to identify and dye test these potential sources. At a minimum the sump pump and floor drain previously identified are required to be disconnected, as they are illegal connections to sanitary sewer. Please coordinate directly with the Sewer Division and we will put the applicant in touch with our outside engineering consultant (CDM Smith) to coordinate field investigations and determine next steps. However, any open I&I sources will need to be addressed and corrected during the P&Z phase.
- Please review the attached letter dated February 2020 from the Sewer Division to the Carmel Academy. While initial inspections and investigations were started, no Sewer CCTV Inspection Permit was obtained, CCTV videos were not submitted to the Sewer Division and none of the work required and outlined in the attached letter were addressed to the Sewer Division's satisfaction. Please coordinate with the Sewer Division, obtain the necessary Sewer CCTV Inspection Permit, complete CCTV inspection of all sanitary sewer laterals and private shared mains and all of the items listed in the February 2020 letter will need to be completed to the Sewer Division's satisfaction during the P&Z phase of this application.
- Please have the applicant contact the Sewer Division to discuss their responsibilities with the shared private sanitary sewer line that runs through adjacent private properties and requires sewer rehabilitation work. This is outlined in the February 2020 letter mentioned above.
- The proposed development discharges into a segment of the Town's sanitary sewer system (the "Horseneck Sewer") that has experienced capacity concerns under certain flow conditions typically associated with wet weather. Given the potential for capacity issues, this system is under further study. Potential improvements to the system may be required and implemented through the capital improvement planning process in future. In areas where capacity may be limited under such conditions, it is DPW's policy to

accommodate flows in keeping with current zoning to the extent possible. The applicant/owner is required to provide existing sanitary sewer flows from the existing site development and to estimate future flows based on the proposed use. Please coordinate directly with the Sewer Division. Existing flows must include a MINIMUM of at least two year's-worth of water usage data and proposed flows with sufficient engineering calculations, peaking factors, etc. for Sewer Division review.

- The applicant/owner will be required to perform CCTV inspections of all of the sanitary sewer laterals and private mains (if applicable) that serve the existing buildings to confirm there are no issues with the existing sanitary sewer lateral. Any televising of sanitary sewer laterals must be performed in the presence of the Environmental Asset Engineer / Sewer Inspector. Please coordinate with Sewer Division – Environmental Asset Engineer (203) 622-0963 extension 5. Make a DVD of this inspection. Submit a copy of the DVD to the Sewer Division. Failure to have the Environmental Asset Engineer present during the TVing will result in the Sewer Division not accepting the DVD. Note: VHS format is not accepted. Only DVDs are accepted. Make a copy of the DVD for your records. The Town will not return DVDs. The Town cannot make copies of DVDs. The DVD should be submitted along with a site plan that identifies each investigation run on the DVD.

Comments to be addressed during Sewer and Building Permit phase:

- It does not appear that there are proposed revisions to the existing property at this time. If that is not correct, or if there are proposed changes to the existing buildings and site modifications, the applicant/owner is required to coordinate with the Sewer Division for any Sewer Permitting.
- Please note, sanitary sewers are designed for first floor elevations. Therefore, any plumbing fixtures in lower levels (basements) could be subject to sanitary sewer backups/overflows. The property owner is strongly recommended to consider and review this and plan accordingly to protect themselves in those situations. The Town is not responsible for damages as a result of these connections/installations. Please consider this and revise accordingly.
- Please note, in accordance with Town regulations and standard practice, all clear water sources cannot discharge to sanitary sewer. This includes air conditioning and high efficiency heating system condensate lines. Please confirm that the new development will not discharge any clear water sources to sanitary sewer.

Please NOTE: These comments are intended for P&Z review only. These comments do not take the place of Sewer Permit(s). Any Sewer Permit Applications receive thorough reviews and may result in additional comments/requirements at that time. In addition, please be reminded that in order to receive Building Permits, the applicant must have secured all other necessary permits, including, but not limited to, Sewer Permits **PRIOR** to obtaining their Building Permits.

Also, please note, the applicant should **NOT** submit for Sewer Permits until the project has received approval from P&Z.

Amy J. Siebert, P.E.
COMMISSIONER

James W. Michel, P.E.
DEPUTY COMMISSIONER



Building Inspection
Building Construction & Maintenance
Engineering
Highway/Traffic Operations
Sewer
Waste Disposal

DEPARTMENT OF PUBLIC WORKS

February 18, 2020

Carmel Academy
Mr. Alex Ham, Jr. – Director of Facilities
270 Lake Avenue
Greenwich, CT 06830

CERTIFIED MAIL
RETURN RECEIPT

Re: CCTV Inspection of Private 8-inch Diameter Sanitary Sewer Main

Dear Mr. Ham:

We are writing to you as the Facilities Director of Carmel Academy at 270 Lake Avenue in Greenwich, Connecticut. As part of work performed by your neighbor at 41 Rock Ridge Avenue, they were required to perform CCTV inspection of the shared private sanitary sewer main that your school is connected to along with 34 Rock Ridge Avenue and 41 Rock Ridge Avenue. We recently reviewed the DVD of the CCTV inspection of this shared private main from a sewer manhole on the property of 41 Rock Ridge downstream to a sewer manhole on the neighboring property at 44 Rock Ridge Avenue. This is a total of approximately 120-feet +/- . Our review of this segment identified the first 60-or so feet had been replaced with PVC pipe. However, beyond the property line of 41 Rock Ridge Avenue, there are significant issues that were identified including tree root intrusion at several pipe joints, cracks in the pipe, mineral deposits which indicate the pipe is taking in groundwater and/or stormwater, an active leak and a section where the pipe is broken with roots and multiple cracks throughout.

In addition, a review of additional CCTV inspection of a portion of the sanitary sewer lateral (the pipe) that serves your facility was full of tree root intrusion at practically every joint. You are required to have your sewer laterals CCTV inspected with our Environmental Asset Engineer present and submit the DVDs of the CCTV inspection for our review. You will need to obtain a Sewer CCTV Inspection Permit from the Sewer Division for this work. Attached, is a copy of our Sewer Permit Application Package for your convenience.

The Town of Greenwich maintains separate systems. One is for sanitary sewage which is wastewater from sinks, toilets, showers, etc. in the sewer system that ultimately goes to the Grass Island Wastewater Treatment Plant for treatment. The other pipe network is drainage which is water from rain, snow and groundwater in a separate piping network that goes to receiving water bodies through outfall pipes. The Town of Greenwich has been under orders from the U.S. Department of Justice (DOJ), the U.S. Environmental Protection Agency (EPA), and the Connecticut Department of Energy and Environmental Protection (CTDEEP) to remove sources of inflow and infiltration from our sanitary sewer collection system. Simply stated, Inflow is ground or storm water that is discharged to sanitary sewers from sources such as basement sump pumps, floor drains, roof

leaders, foundation and yard drains and catch basins. Infiltration is groundwater and or storm water that enters the sanitary sewer system from leaks in pipes, pipe deficiencies, manholes, etc. High flows generated from inflow and infiltration sources throughout Greenwich result in increased energy costs, treatment costs and can cause overflows of the sewer collection system. These overflows have a detrimental effect on the ecology of the Long Island Sound, reduce the quality of the waters for recreational activity, and provide unhealthy environmental conditions for our residents. Failure to remedy this situation exposes the Town and individuals to fines and other legal action.

As indicated on the approved plans for 41 Rock Ridge Avenue, the condition of the private 8-inch shared sewer main was unknown and needed to be cleaned and CCTV inspected to determine its condition. The results of that inspection and any issues found were to be relayed to the Sewer Division. We anticipated that this would have been completed earlier in the construction phase.

Based on the review of the CCTV inspection, we have determined that the remaining approximately 60-feet +/- of clay pipe from the property line of 41 Rock Ridge Avenue downstream to the sewer manhole on the property of 44 Rock Ridge Avenue needs to be replaced. This shared private main conveys the wastewater from your property, 41 Rock Ridge Avenue (the Halls) and 34 Rock Ridge Avenue (the Breeds) only.

We will be sending similar letters to 34 Rock Ridge Avenue and 41 Rock Ridge Avenue and requesting that they work collectively with you to get this pipe addressed. We will also be notifying the property owner of 44 Rock Ridge Avenue to let them know about the sewer work that needs to occur on their property. If you have any existing easement information and/or sewer maintenance agreements for your property and/or this private shared sewer main that runs through adjacent properties, please provide a copy to our office for our review. It would be helpful for us to understand each property owner's responsibilities.

The required sewer work for the private shared sewer main can be completed under the existing Sewer Permit (PRSD201900915) for 41 Rock Ridge Avenue, but needs to be coordinated with our Environmental Asset Engineer, Al Romano. Al can be reached at 203-622-0963 ext. 5. All sewer work must be inspected by Al prior to any backfilling, etc. The CCTV inspection of your sanitary sewer laterals for Carmel Academy requires separate Sewer CCTV Inspection Permit as previously indicated.

Should you have any questions or concerns, please contact this office at (203) 622-7760.

Very truly yours,



Richard C. Feminella, P.E.
Wastewater Division Manager

Attachment: Sewer Permit Application Package

cc: A. Siebert, Commissioner
C.T. Mandras, Maintenance Manager
A. Romano, Environmental Asset Engineer
File

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