

five or more acres, registration describing the site and the construction activity must be submitted to the DEEP prior to the initiation of construction. A stormwater pollution control plan, including measures such as erosion and sediment controls and post construction stormwater management, must be prepared. For sites where more than 10 acres will be disturbed, the plan must be submitted to the DEEP. 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. For construction projects with a total disturbed area between one and five acres, no registration is required as long as the project is reviewed by the town and receives written approval of its erosion and sediment control measures and it adheres to the Connecticut Guidelines for Soil Erosion and Sediment Control.

- c) *Noise*— No negatives impacts are anticipated.
- 2) *Impact on a public water supply system or serious effects on groundwater, flooding, erosion, or sedimentation*
- a) *Water Supply*— Water and sewer service is available at Dayton Road. Sewers in this portion of Waterford flow into the New London system. The New London water pollution control facility has a design capacity of 10.0 million gallons per day (mgd); average flows in 2011 were 7.64 mgd. Water is supplied by the Waterford Utility Commission solely using supply purchased from the City of New London. The Water Supply Plan for the New London Water & Water Pollution Control Authority, revised in March 2009, indicates that various improvements, primarily at Lake Konomoc, were needed to provide an adequate margin of safety in the short term. In addition, the Thames River regional pipeline had not been installed. The present status of existing supply and future demand projections for the utility are not available, so the ability of the utility to serve the site should be confirmed.

The project does not appear to be in a public water supply source water area.

- b) *Groundwater*— No negatives impacts are anticipated.
 - c) *Flooding*— No negatives impacts are anticipated.
- 3) *Disruption or alteration of an historic, archeological, cultural or recreational building, object, district, site or surroundings*—

It is SHPO's opinion that the proposed demolition of the Cohanzie School would have an adverse effect on the integrity on the historic property. We recommend the following measures be implemented to avoid, minimize or mitigate the loss of this significant historic building:

1. DECD and the Town should allow six weeks from the date of this letter for a feasible redevelopment proposal to be submitted to the Town that would preserve the primary historic features of the original 1924 school building. Such a proposal must be acceptable to the Town of Waterford AND be compatible with the Town's approved

funding through DECD's Municipal Brownfields Program.

2. If no such proposal is submitted to the Town by the close of business on November 16, 2012, DECD and the Town should ensure that the following mitigation measures are implemented prior to the alteration of the property:

- a. A professional State-Level photographic and narrative documentation of the Cohanzie School will be prepared consistent with current SHPO standards. Two hard copies of the documentation should be provided to our office and one copy should be provided to the Waterford Municipal Historian.
- b. The Town, in consultation with the Municipal Historian, should prepare an interpretive exhibit on the historic transition from one-room school houses to consolidated district schools in Waterford. The Town should invite the Waterford Historical Society to participate in the preparation of the exhibit. That exhibit may be displayed at the Town Hall, Historical Society, or other appropriate site that is mutually acceptable to the Historical Society and Town.

4) *Effect on natural land resources and formations, including coastal and inland wetlands, and the maintenance of in-stream flows—*

The Natural Resources Conservation Service's soil survey depicts a lobe of Timakwa & Natchaug soils, a regulated wetland soil, associated with an unnamed tributary of Nevins Brook in the rear of the subject property. Existing wetlands and watercourses at the site should be delineated by a certified soil scientist. Any subsequent development, including both buildings and access roadways, should avoid regulated areas to the maximum extent practicable. Unavoidable impacts should be mitigated and buffer areas established to further protect wetlands and watercourses.

Any inland wetlands or watercourses at the site are regulated by the local inland wetlands agency, pursuant to section 22a-42 of the Connecticut General Statutes (CGS). Many local agencies have established setback or buffer areas that 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](#).

5) *Effect on natural communities and upon critical species of animal or plant and their habitats: interference with the movement of any resident or migratory fish or wildlife species—*

The Natural Diversity Data Base (NDDDB) 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 the project area. The Natural Diversity Data Base information is not the result of comprehensive or site-specific field investigations. Also be advised that this is a preliminary review and not a final determination. 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 NDDDB should not be substituted for on-site surveys required for environmental assessments. The NDDDB includes all information regarding critical biological resources available at the time of the request. This information is a compilation of data collected over the years by the Department's Natural History Survey and cooperating units of DEEP, private conservation groups and the scientific community. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated into the Data Base as it becomes available. If the project is not implemented within 12 months, then another NDDDB review should be requested for up-to-date information.

- 6) *Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to create extensive detrimental environmental impact*— No negatives impacts are anticipated.
- 7) *Substantial aesthetic or visual effects*— No negatives impacts are anticipated.
- 8) *Inconsistency with the written and/or mapped policies of the statewide Plan of Conservation and Development and such other plans and policies developed or coordinated by the Office of Policy and Management or other agency*—

The project site is classified as Existing Preserved Open Space in the Conservation and Development Policies Plan for Connecticut 2005 -2012 as well as the draft revision of the plan. This is apparently due to its former use as school property. In general, the Department does not include municipal school parcels in its Protected Open Space Mapping Project. The Office of Policy & Management should be consulted regarding the designation of the site and consistency of the project with the plan's policies.

- 9) *Disruption or division of an established community or inconsistency with adopted municipal or regional plans*— No negatives impacts are anticipated.
- 10) *Displacement or addition of substantial numbers of people*— No negatives impacts are anticipated.
- 11) *Substantial increase in congestion (traffic, recreational, other)*— No negatives impacts are anticipated.
- 12) *A substantial increase in the type or rate of energy use as a direct or indirect result of the action*— No negatives impacts are anticipated.

13) *The creation of a hazard to human health or safety—*

Should the project include any renovation, remodeling or demolition of existing buildings, or the excavation of soils, then a plan must be in place to address lead-based paint, asbestos and lead contaminated soils since these types of construction activities could result in the disturbance of surfaces that may contain lead-based paint, asbestos and/or lead contaminated soils. If a building is constructed, it should be built using radon resistant features for occupied spaces such as medical offices/residences.

A site in an historical urbanized area may have existing or potential environmental problems that have not been detected or resulted in regulatory action by the DEEP. In order to confirm that the subject property has not been the site of improper disposal of waste or does not contain some other environmental liabilities, it is suggested that an environmental or engineering consultant be retained to conduct a site investigation and sampling/testing, as appropriate. The investigation should include an inquiry into the historic uses and fuel storage on the property to assess the likelihood of encountering solid or hazardous waste or soil contamination. In order to ascertain the environmental status of properties, it is typically recommended that a Phase I environmental site assessment (ESA) be performed at the site. If the Phase I ESA indicates site contamination is likely, a Phase II ESA should be performed to confirm or deny the presence of contamination. In order to achieve proper remediation, the extent of contamination should be clearly defined through a Phase III ESA, a cleanup plan developed, and measures implemented that will clean up the site in accordance with applicable criteria in the Connecticut Remediation Standard Regulations adopted pursuant to section 22a-133k of the Connecticut General Statutes.

Development plans in urban areas that entail soil excavation should include a protocol for sampling and analysis of potentially contaminated soil. Soil with contaminant levels that exceed the applicable criteria of the Remediation Standard Regulations, that is not hazardous waste, is considered to be special waste. The disposal of special wastes, as defined in section 22a-209-1 of the RCSA, requires written authorization from the DEEP Waste Engineering and Enforcement Division prior to delivery to any solid waste disposal facility in Connecticut. If clean fill is to be segregated from waste material, there must be strict adherence to the definition of clean fill, as provided in Section 22a-209-1 of the RCSA. In addition, the regulations prohibit the disposal of more than 10 cubic yards of stumps, brush or woodchips on the site, either buried or on the surface. The DEEP Waste Engineering & Enforcement Division has issued a General Permit for Contaminated Soil and/or Sediment Management (Staging & Transfer). It establishes a uniform set of environmentally protective management measures for stockpiling soils when they are generated during construction or utility installation projects where contaminated soils are typically managed (held temporarily during characterization procedures to determine a final disposition). Temporary storage of less than 1000 cubic yards of contaminated soils (which are not hazardous waste) at the excavation site does not require registration, provided that activities are conducted in accordance with the applicable conditions of the general permit. Registration is required for on-site storage of

more than 1000 cubic yards for more than 45 days or transfer of more than 10 cubic yards off-site.

Prior to the demolition of any commercial, industrial or public buildings or buildings containing five or more residential units, they must be inspected for asbestos-containing materials and any such materials must be removed. The disposal of material containing asbestos requires the approval of the DEEP Waste Engineering and Enforcement Division pursuant to section 22a-209-8(i) of the Regulations of Connecticut State Agencies. The disposal of demolition waste should be handled in accordance with applicable solid waste statutes and regulations. Construction and demolition debris should be segregated on-site and reused or recycled to the greatest extent possible. The removal of underground storage tanks should follow the procedures outlined in the code of the National Fire Protection Association (NFPA 30, Appendix B). Residue generated by the removal of lead paint is considered to be hazardous waste if it meets the characteristics contained at 40 CFR 261. This must be determined on a case-by-case basis for each abatement project prior to disposal. The site should be inspected for any electrical equipment such as transformers or capacitors, which may contain PCB's. In recent years, EPA has learned that caulk containing potentially harmful polychlorinated biphenyls (PCBs) was used around windows, door frames, masonry columns and other masonry building materials in many buildings starting in 1929 with increased popularity in the 1950s through the 1970s, including schools, large scale apartment complexes and public buildings. EPA recommends testing caulk that is going to be removed as the first step in order to determine what protections are needed during removal.

- 14) *Any other substantial impact on natural, cultural, recreational or scenic resources*— No negatives impacts are anticipated.

Conclusion:

The Town of Waterford shall address the following concerns as a requirement for utilization of state funding for the proposed project:

- Existing wetlands and watercourses at the site should be delineated by a certified soil scientist.
- The present status of existing water supply and future demand projections for the Waterford Utility Commission are not available, so the ability of the utility to serve the site should be confirmed.
- In order to confirm that the subject property has not been the site of improper disposal of waste or does not contain some other environmental liabilities, it is suggested that an environmental or engineering consultant be retained to conduct a site investigation and sampling/testing, as appropriate.
- The project site is classified as Existing Preserved Open Space in the Conservation and Development Policies Plan for Connecticut 2005 -2012 as well as the draft revision of the plan. This is apparently due to its former use as school property. In general, the Department does not include municipal school parcels in its Protected Open Space Mapping Project. The Office of Policy & Management should be consulted regarding the designation of the site and consistency of the project with the plan's policies.
- DECD and the Town should allow six weeks from the date of this letter for a feasible redevelopment proposal to be submitted to the Town that would preserve the primary historic

features of the original 1924 school building. Such a proposal must be acceptable to the Town of Waterford AND be compatible with the Town's approved funding through DECD's Municipal Brownfields Program. If no such proposal is submitted to the Town by the close of business on November 16, 2012, DECD and the Town should ensure that the following mitigation measures are implemented prior to the alteration of the property:

- A professional State-Level photographic and narrative documentation of the Cohanzie School will be prepared consistent with current SHPO standards. Two hard copies of the documentation should be provided to our office and one copy should be provided to the Waterford Municipal Historian.
- The Town, in consultation with the Municipal Historian, should prepare an interpretive exhibit on the historic transition from one-room school houses to consolidated district schools in Waterford. The Town should invite the Waterford Historical Society to participate in the preparation of the exhibit. That exhibit may be displayed at the Town Hall, Historical Society, or other appropriate site that is mutually acceptable to the Historical Society and Town.

Recommendations:

The Environmental Assessment for this project does not appear to trigger an obligation under CEPA for an EIE.



**State Historic
Preservation Office**



DECD
State of Connecticut
Department of Economic and
Community Development

October 5, 2012

Mark Hood
Office of Responsible Development
Department of Economic & Community Development
505 Hudson Street
Hartford, CT 06106-7106

Subject: 40/44/48 Dayton Road, Waterford, Connecticut.

Dear Mr. Hood:

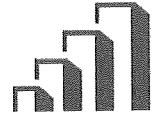
The Connecticut State Historic Preservation Office has reviewed the proposed remediation of the referenced property using the Department of Economic and Community Development's Municipal Brownfield's Program funding. The c. 1924 Cohanzie School, which was listed in the State Register of Historic Places in May of 2012, is located on the property and will be demolished as a result of the site remediation. Due to the potential demolition or major alteration of this historic building, DECD held a public scoping meeting to provide an opportunity for concerned citizens and other parties to comment on the proposed action. We note that school has been vacant for some time now and both the Town and members of the public have expressed concerns with on-going vandalism and the failure of previous attempts by the Town to encourage the adaptive re-use or redevelopment of the property. We are further aware that a developer has expressed interest in a potential adaptive re-use project for this site, but, to our knowledge, no specific proposal has been presented to the State or Town. Although SHPO encourages the preservation of significant historic buildings whenever feasible, the public interest in preservation is best served when these buildings are occupied and maintained such that they contribute to the community's sense of place and history.

It is SHPO's opinion that the proposed demolition of the Cohanzie School would have an adverse effect on the integrity on the historic property. We recommend the following measures be implemented to avoid, minimize or mitigate the loss of this significant historic building:

1. DECD and the Town should allow six weeks from the date of this letter for a feasible redevelopment proposal to be submitted to the Town that would preserve the primary historic features of the original 1924 school building. Such a proposal must be acceptable to the Town of Waterford AND be compatible with the Town's approved funding through DECD's Municipal Brownfields Program.



**State Historic
Preservation Office**



DECD
State of Connecticut
Department of Economic and
Community Development

*Hood – 40/44/48 Dayton Rd, Waterford
October 5, 2012
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2. If no such proposal is submitted to the Town by the close of business on November 16, 2012, DECD and the Town should ensure that the following mitigation measures are implemented prior to the alteration of the property:
 - a. A professional State-Level photographic and narrative documentation of the Cohanzie School will be prepared consistent with current SHPO standards. Two hard copies of the documentation should be provided to our office and one copy should be provided to the Waterford Municipal Historian.
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The State Historic Preservation Office appreciates the opportunity to review and comment upon this action. These comments are provided in accordance with the Connecticut Environmental Policy Act. For further information, please contact Susan Chandler at (860) 256-2764 or susan.chandler@ct.gov.

Sincerely,

Daniel T. Forrest
Deputy State Historic Preservation Officer

CC: Lowenberg/DECD
Kieltyka/DECD
Steward/1st Selectman, Waterford
Wagner/Planning Department, Waterford



**CONNECTICUT DEPARTMENT OF
ENERGY & ENVIRONMENTAL PROTECTION**
OFFICE OF ENVIRONMENTAL REVIEW
79 ELM STREET, HARTFORD, CT 06106-5127

To: Mark Hood - Project Manager
DECD - Office of Responsible Development, 505 Hudson Street, Hartford, CT

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

Date: October 4, 2012 **E-Mail:** david.fox@ct.gov

Subject: Dayton Road, Waterford

The Department of Energy & Environmental Protection (DEEP) has received the Notice of Scoping for proposed site development activities at 40-48 Dayton Road in Waterford. The following comments are submitted for your consideration.

The Natural Resources Conservation Service's soil survey depicts a lobe of Timakwa & Natchaug soils, a regulated wetland soil, associated with an unnamed tributary of Nevins Brook in the rear of the subject property. Existing wetlands and watercourses at the site should be delineated by a certified soil scientist. Any subsequent development, including both buildings and access roadways, should avoid regulated areas to the maximum extent practicable. Unavoidable impacts should be mitigated and buffer areas established to further protect wetlands and watercourses.

Any inland wetlands or watercourses at the site are regulated by the local inland wetlands agency, pursuant to section 22a-42 of the Connecticut General Statutes (CGS). Many local agencies have established setback or buffer areas that 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](#).

The Department strongly supports the use of low impact development (LID) practices such as water quality swales and rain gardens for infiltration of stormwater on site. Key strategies for effective LID include: managing stormwater close to where precipitation falls; infiltrating, filtering, and storing as much stormwater as feasible; managing stormwater at multiple locations throughout the landscape; conserving and restoring natural vegetation and soils; preserving open space and minimizing land disturbance; designing the site to minimize impervious surfaces; and providing for maintenance and education. Water quality and quantity benefits are maximized when multiple techniques are grouped together. Consequently, we typically recommend the utilization of one, or a combination of, the following measures:

- the use of pervious pavement or grid pavers (which are very compatible for parking lot and fire lane applications), or impervious pavement without curbs or with notched curbs to direct runoff to properly designed and installed infiltration areas,
- the use of vegetated swales, tree box filters, and/or infiltration islands to infiltrate and treat stormwater runoff (from building roofs and parking lots),
- the minimization of access road widths and parking lot areas to the maximum extent possible to reduce the area of impervious surface,
- if soil conditions permit, the use of dry wells to manage runoff from the building roofs,
- the use of vegetated roofs (green roofs) to reduce the runoff from buildings,
- proper treatment of special activity areas (e.g. loading docks, covered maintenance and service areas),
- the installation of rainwater harvesting systems to capture stormwater from building roofs for the purpose of reuse for irrigation, and
- providing for pollution prevention measures to reduce the introduction of pollutants to the environment.

The effectiveness of various LID techniques that rely on infiltration depends on the soil types present at the site. According to the Natural Resources Conservation Service's soil survey, the non-wetland soils at the property consist of urban land and Charleton-Chatfield complex. These former soils are unrated in their suitability for various stormwater management practices, while the latter is rated as somewhat suitable for pervious pavement. However, infiltration practices may be suitable at this site. Soil mapping consists of a minimum 3 acres map unit and soils may vary substantially within each mapping unit. Test pits should be dug in areas planned for infiltration practices to verify soil suitability and/or limitations. Planning should insure that areas to be used for infiltration are not compacted during the construction process by vehicles or machinery. The siting of areas for infiltration must also consider any existing soil or groundwater contamination.

The Department has compiled a listing of web resources with information about watershed management, green infrastructure and LID best management practices. It may be found on-line at: [LID Resources](#).

Stormwater discharges from construction sites where one or more acres are to be disturbed require a permit pursuant to 40 CFR 122.26. The Permitting & Enforcement Division has issued a *General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities* (DEP-PERD-GP-015) that will cover these discharges. For projects disturbing five or more acres, registration describing the site and the construction activity must be submitted to the Department prior to the initiation of construction. A stormwater pollution control plan, including measures such as erosion and sediment controls and post construction stormwater management, must be prepared. For sites where more than 10 acres will be disturbed, the plan must be submitted to the Department. 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. For construction projects with a total disturbed area between one and five acres, no registration is required as long as the project is reviewed by the town and receives written approval of its erosion and sediment control measures and it adheres to the *Connecticut Guidelines for Soil Erosion and Sediment Control*. If no review is

conducted by the town or written approval is not provided, the permittee must register with the Department. 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](#).

The Natural Diversity Data Base (NDDB) 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 the project area. The Natural Diversity Data Base information is not the result of comprehensive or site-specific field investigations. Also be advised that this is a preliminary review and not a final determination. 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 NDDB should not be substituted for on-site surveys required for environmental assessments. The NDDB includes all information regarding critical biological resources available at the time of the request. This information is a compilation of data collected over the years by the Department's Natural History Survey and cooperating units of DEEP, private conservation groups and the scientific community. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated into the Data Base as it becomes available. If the project is not implemented within 12 months, then another NDDB review should be requested for up-to-date information.

The project site is classified as Existing Preserved Open Space in the *Conservation and Development Policies Plan for Connecticut 2005 -2012* as well as the draft revision of the plan. This is apparently due to its former use as school property. In general, the Department does not include municipal school parcels in its Protected Open Space Mapping Project. The Office of Policy & Management should be consulted regarding the designation of the site and consistency of the project with the plan's policies.

Water and sewer service is available at Dayton Road. Sewers in this portion of Waterford flow into the New London system. The New London water pollution control facility has a design capacity of 10.0 million gallons per day (mgd); average flows in 2011 were 7.64 mgd.

Water is supplied by the Waterford Utility Commission solely using supply purchased from the City of New London. The Water Supply Plan for the New London Water & Water Pollution Control Authority, revised in March 2009, indicates that various improvements, primarily at Lake Konomoc, were needed to provide an adequate margin of safety in the short term. In addition, the Thames River regional pipeline had not been installed. The present status of existing supply and future demand projections for the utility are not available, so the ability of the utility to serve the site should be confirmed.

A site in an historical urbanized area may have existing or potential environmental problems that have not been detected or resulted in regulatory action by the Department. In order to confirm that the subject property has not been the site of improper disposal of waste or does not contain some other environmental liabilities, it is suggested that an environmental or engineering consultant be retained to conduct a site investigation and sampling/testing, as appropriate. The investigation should include an inquiry into the historic uses and fuel storage on the property to assess the likelihood of encountering solid or hazardous waste or soil contamination. In order to ascertain the environmental status of properties, it is typically

recommended that a Phase I environmental site assessment (ESA) be performed at the site. If the Phase I ESA indicates site contamination is likely, a Phase II ESA should be performed to confirm or deny the presence of contamination. In order to achieve proper remediation, the extent of contamination should be clearly defined through a Phase III ESA, a cleanup plan developed, and measures implemented that will clean up the site in accordance with applicable criteria in the Connecticut Remediation Standard Regulations adopted pursuant to section 22a-133k of the Connecticut General Statutes. For further information, contact the Remediation Division at 860-424-3705. The Connecticut Remediation Standard Regulations are available on-line at: [Remediation Regulations](#).

Development plans in urban areas that entail soil excavation should include a protocol for sampling and analysis of potentially contaminated soil. Soil with contaminant levels that exceed the applicable criteria of the Remediation Standard Regulations, that is not hazardous waste, is considered to be special waste. The disposal of special wastes, as defined in section 22a-209-1 of the RCSA, requires written authorization from the Waste Engineering and Enforcement Division prior to delivery to any solid waste disposal facility in Connecticut. If clean fill is to be segregated from waste material, there must be strict adherence to the definition of clean fill, as provided in Section 22a-209-1 of the RCSA. In addition, the regulations prohibit the disposal of more than 10 cubic yards of stumps, brush or woodchips on the site, either buried or on the surface. A fact sheet regarding disposal of special wastes and the authorization application form may be obtained at: [Special Waste Fact Sheet](#).

The Waste Engineering & Enforcement Division has issued a *General Permit for Contaminated Soil and/or Sediment Management (Staging & Transfer)*. It establishes a uniform set of environmentally protective management measures for stockpiling soils when they are generated during construction or utility installation projects where contaminated soils are typically managed (held temporarily during characterization procedures to determine a final disposition). Temporary storage of less than 1000 cubic yards of contaminated soils (which are not hazardous waste) at the excavation site does not require registration, provided that activities are conducted in accordance with the applicable conditions of the general permit. Registration is required for on-site storage of more than 1000 cubic yards for more than 45 days or transfer of more than 10 cubic yards off-site. A fact sheet describing the general permit, a copy of the general permit and registration forms are available on-line at: [Soil Management GP](#).

The following standard comments regarding building renovation or demolition projects should be observed, as applicable, during future planning and implementation of the project. Fact sheets providing additional information concerning environmental, health and safety requirements applicable to building renovation and demolition projects have been developed by the Waste Engineering & Enforcement Division. To obtain copies, call the division at 860-424-3023. This information is also available on-line at: [Health & Safety Requirements](#).

Prior to the demolition of any commercial, industrial or public buildings or buildings containing five or more residential units, they must be inspected for asbestos-containing materials and any such materials must be removed. Written notice must be submitted to the Department of Public Health 10 working days prior to demolition in accordance with Section 19a-332a-3 of the Regulations of Connecticut State Agencies, for buildings involving more than 10 linear feet or more than 25 square feet of asbestos-containing material. For further information, contact DPH at (860)

509-7367. Additional information concerning regulation of asbestos may be found at: [Asbestos Program](#)

The disposal of material containing asbestos requires the approval of the Waste Engineering and Enforcement Division pursuant to section 22a-209-8(i) of the Regulations of Connecticut State Agencies. Proper disposal technique requires that the material be bagged and labeled and placed in an approved secure landfill. For further information, contact the division at 860-424-3366. A fact sheet regarding disposal of special wastes and the authorization application form may be obtained at: [Special Waste Fact Sheet](#).

The disposal of demolition waste should be handled in accordance with applicable solid waste statutes and regulations. Demolition debris may be contaminated with asbestos, lead-based paint or chemical residues and require special disposal. Clean fill is defined in section 22a-209-1 of the Regulations of Connecticut State Agencies (RCSA) and includes only natural soil, rock, brick, ceramics, concrete and asphalt paving fragments. Clean fill can be used on site or at appropriate off-site locations. Clean fill does not include uncured asphalt, demolition waste containing other than brick or rubble, contaminated demolition wastes (e.g. contaminated with oil or lead paint), tree stumps, or any kind of contaminated soils. Landclearing debris and waste other than clean fill resulting from demolition activities is considered bulky waste, also defined in section 22a-209-1 of the RCSA. Bulky waste is classified as special waste and must be disposed of at a permitted landfill or other solid waste processing facility pursuant to section 22a-208c of the Connecticut General Statutes and section 22a-209-2 of the RCSA. Additional information concerning disposal of demolition debris is available on-line at: [Demolition Debris](#).

Construction and demolition debris should be segregated on-site and reused or recycled to the greatest extent possible. Waste management plans for construction, renovation or demolition projects are encouraged to help meet the State's reuse and recycling goals. The *State Solid Waste Management Plan* outlines a goal of 58% recovery rate for municipal solid waste by the year 2024. Part of this effort includes increasing the amount of construction and demolition materials recovered for reuse and recycling in Connecticut. It is recommended that contracts be awarded only to those companies who present a sufficiently detailed construction/demolition waste management plan for reuse/recycling. Additional information concerning construction and demolition material management and waste management plans can be found on-line at: [C&D Material Management](#) and [C&D Waste Management Plans](#).

The removal of underground storage tanks should follow the procedures outlined in the code of the National Fire Protection Association (NFPA 30, Appendix B). Individual soil samples should be obtained from the underlying native soil. A listing of potential contaminants that should be analyzed and suggested analytical methods is available on-line at: [Sampling Methodology](#). If contaminated soil, ground water or free product is observed at the site or detected by sample analysis, the DEEP must be immediately notified at 860-424-3338 and corrective action must be undertaken in accordance with section 22a-449(d)-106 of the Regulations of Connecticut State

Agencies. Closure reports, including confirmation of sampling and clean-up, are required by Federal and State law. For further information, contact the Bureau of Materials Management & Compliance Assurance, Underground Storage Tank Program at 860-424-3374.

Residue generated by the removal of lead paint is considered to be hazardous waste if it meets the characteristics contained at 40 CFR 261. This must be determined on a case-by-case basis for each abatement project prior to disposal. The disposal of hazardous waste is regulated pursuant to sections 22a-449(c)-11 and 22a-449(c)-100 through 22a-449(c)-110 of the Regulations of Connecticut State Agencies. Proper disposal procedure is for a permitted hazardous waste hauler to transport the waste to an approved disposal facility. The Bureau of Materials Management & Compliance Assurance has prepared a document, *Guidance for the Management and Disposal of Lead-Contaminated Materials Generated in the Lead Abatement, Renovation and Demolition Industries*. The document is available on-line at: [Lead Disposal Guidance](#).

The site should be inspected for any electrical equipment such as transformers or capacitors, which may contain PCB's. In addition, the PCB Transformer Fires Final Rule (40 CFR 761) requires that each PCB transformer in use or stored for reuse must be registered with the local fire department. PCB transformers are prohibited from use in and near commercial and public buildings (e.g. schools, hospitals, offices, etc.). For further information, contact the Bureau of Materials Management & Compliance Assurance, PCB Program at 860-424-3368. Additional information is also available on-line at: [PCB Program](#).

In recent years, EPA has learned that caulk containing potentially harmful polychlorinated biphenyls (PCBs) was used around windows, door frames, masonry columns and other masonry building materials in many buildings starting in 1929 with increased popularity in the 1950s through the 1970s, including schools, large scale apartment complexes and public buildings. In general, these types of buildings built after 1978 do not contain PCBs in caulk. In 2009, EPA announced new guidance about managing PCBs in caulk and tools to help minimize possible exposure. Where schools or other buildings were constructed or renovated prior to 1978, EPA and DEEP recommend that PCB-containing caulk removal be scheduled during planned renovations, repairs (when replacing windows, doors, roofs, ventilation, etc.) and demolition projects, whenever possible. However, the continued use of such PCB materials is prohibited and, where it is identified, it must be addressed. EPA recommends testing caulk that is going to be removed as the first step in order to determine what protections are needed during removal. Where testing confirms the presence of PCBs, it is critically important to ensure that they are not released to air during replacement or repair of caulk in affected buildings. Many such PCB removal projects will need to include sampling of the substrate and soil, as well as require plans to be approved by EPA in coordination with DEEP. Further information concerning the DEEP PCB Program can be found on-line at: [DEEP PCB Program](#). The EPA guidance can be found at: [PCBs in Caulk](#).

Thank you for the opportunity to review this proposal. If you have any questions concerning these comments, please contact me.

cc: Robert Hannon, DEEP/OPPD

STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH



Jewel Mullen, M.D., M.P.H., M.P.A.
Commissioner

Dannel P. Malloy
Governor
Nancy Wyman
Lt. Governor

Drinking Water Section

October 4, 2012

Mr. Mark Hood
Department of Economic and Community Development
505 Hudson Street
Hartford, CT 06106

Re: Notice of Scoping for 40/44/48 Dayton Road, Waterford

Dear Mr. Hood:

The Drinking Water Section of the Department of Public Health has reviewed the above-mentioned project for potential impacts to any sources of public drinking water supply. This project does not appear to be in a public water supply source water area; therefore, the Drinking Water Section has no comments at this time.

Sincerely,

A handwritten signature in black ink, appearing to read "EMcPhee", written over a horizontal line.

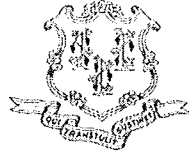
Eric McPhee
Supervising Environmental Analyst
Drinking Water Section



Phone: (860) 509-7333 • Fax: (860) 509-7359 • VP: (860) 899-1611
410 Capitol Avenue, MS#51WAT, P.O. Box 340308
Hartford, Connecticut 06134-0308
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DEPARTMENT OF PUBLIC HEALTH

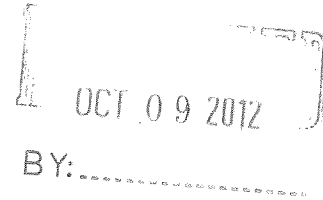


Jewel Mullen, M.D., M.P.H., M.P.A.
Commissioner

Dannel P. Malloy
Governor
Nancy Wyman
Lt. Governor

Environmental Health Section

October 4, 2012



Mark Hood
Department of Economic and Community Development
505 Hudson Street
Hartford, CT 06106

RE: Notice of Scoping for 40/44/48 Dayton Road, Waterford

Dear Mr. Hood:

A review of the scoping notice reveals limited information at this stage of the 40/44/48 Dayton Road, Waterford, CT Project. However, the project description does mention redevelopment of the former Cohanzie School site. Should the project include any renovation, remodeling or demolition of existing buildings, or the excavation of soils, then a plan must be in place to address lead-based paint, asbestos and lead contaminated soils since these types of construction activities could result in the disturbance of surfaces that may contain lead-based paint, asbestos and/or lead contaminated soils. If a building is to be constructed, it should be built using radon resistant features for occupied spaces such as medical offices/residences.

The following summarizes the Department's position with regard to lead, asbestos, and radon:

A. Lead-Based Paint:

It does not appear that excavation or construction activities that may be associated with this project are subject to the Department of Public Health (DPH), Childhood Lead Poisoning Prevention and Control Regulations (§§19a-111-1 through 19a-111-11). However, there are other issues that must be addressed related to lead-based paint. Among these issues are the following:

- Testing of paint on existing structures marked for demolition or testing for lead in soils should be performed by a lead inspector or lead inspector/risk assessor certified by the DPH.



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- Planned demolition or soil removal activities should be performed using lead-safe work practices.
- If lead-based paint or lead contaminated soil is identified, the classification and disposal of generated waste must comply with the Resource Conservation Recovery Act (RCRA) and Connecticut Department of Environmental Protection standards (e. g., Toxicity Characteristics Leaching Procedure [TCLP] testing, reporting, and record keeping requirements).
- Additionally, if lead-based paint, lead containing paint, or lead contaminated soil is identified, workers must be trained (as a minimum) according to the Occupational Safety and Health Administration (OSHA) lead standards (29 CFR 1926.62).
- Because other contaminants may also be present on the site, additional health and safety training may be required (e. g., hazardous waste and/or asbestos).

Additional inquiries on the subject of lead-based paint can be directed to Francesca Provenzano Health Program Supervisor of the Lead Poisoning Prevention and Control Program at (860) 509-7299.

B. Asbestos Program:

The demolition of an existing facility or structure in conjunction with this project may impact asbestos-containing materials. As required by the asbestos National Emission Standards for Hazardous Air Pollutants (40 C.F.R. Part 61, Subpart M) and in order to ensure compliance with DPH regulations, a thorough inspection must be conducted to determine the presence of asbestos prior to the commencement of the planned demolition activity. A DPH licensed asbestos consultant, with certification as an Inspector or a Management Planner, must be hired to conduct such an inspection. If asbestos is identified, it must be properly abated. A DPH licensed asbestos contractor must be hired to conduct asbestos abatement that involves more than three (3) linear feet or more than three (3) square feet of asbestos-containing material. Additionally, the DPH must be provided with notification prior to asbestos abatement that involves greater than ten (10) linear feet or greater than twenty-five (25) square feet of asbestos-containing material. Asbestos abatement must be performed in accordance with all applicable federal, state and local regulations.

Additional inquiries on the subject of asbestos abatement can be directed to Ronald Skomro, Supervising Environmental Analyst of the Asbestos Program at 860-509-7367.

C. Radon

The Connecticut Department of Public Health Radon Program recommends that during the construction of the building, radon resistant features should be built into the infrastructure of the building.

The list below describes the basic components of radon resistant new construction:

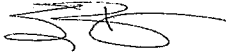
- A gas permeable layer, such as 4-inch gravel, placed beneath the slab to allow soil gases to move freely underneath the building

- Plastic sheeting over the gas permeable layer and under the slab to help prevent soil gases from entering the home
- Sealing and caulking all openings in the foundation floor to reduce soil gas entry
- A vent pipe, such as 6 inch PVC pipe, to run from the gas permeable layer through the building to the roof to safely vent soil gases above the building
- An electrical junction box installed in case an electric venting fan is needed later

The facility should be tested for radon after construction is completed. If radon results are at or above 4.0 picocuries per liter (pCi/L), the existing system should be activated by installing an in-line fan.

Additional inquiries on the subject of radon resistant new construction can be directed to Francesca Provenzano, Health Program Supervisor of the Radon Program, at 860-509-7367.

Sincerely,



Suzanne Blancaflor, M.S., M.P.H.
Chief, Environmental Health Section