

STATE OF CONNECTICUT
DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT
INFRASTRUCTURE AND REAL ESTATE PROJECTS

ENVIRONMENTAL ASSESSMENT CHECKLIST

Project ID No: (issued by OPM)

Date: 6/19/2012

Municipality: Norwalk

State Funds: Yes

Type of State Agency Review:

Staff Contact: Maya Loewenberg

Project Name: 20 North Water Street

Funding Source: Municipal Brownfield Grant Program

Stage 1 X Stage 2

This assessment is being conducted in conformance to the department's Environmental Classification Document to determine CEPA obligations

Project Description:

The City of Norwalk in conjunction with North Water Street LLC (c/o Spinnaker Real Estate Partners LLC) is proposing the redevelopment of the former Norwalk Company site located at 20 North Water Street, Norwalk, CT. Redevelopment activities include: environmental assessment, remediation and monitoring of the 1.895 acre site; demolition of the existing 56,720 square foot brick building; and new construction of a 130,000 square foot mixed-use development consisting of 107 residential rental units and 18,000 square feet of ground floor commercial space. State funds are proposed for environmental assessment, remediation, abatement and monitoring.

Note: environmental remediation is a positive environmental impact, but not a CEPA activity. A CEPA review is required for the proposed environmental remediation project which includes demolition of a building eligible to be listed on the National or State Registers of Historic Places.

RCSA sec. 22a-1a-3 Determination of environmental significance (direct/indirect)

- 1) *Impact on air and water quality or on ambient noise levels*
 - a) *Air*— No negatives impacts are anticipated.
 - b) *Water Quality*— Appropriate controls, designed to remove sediment and oil or grease typically found in runoff from parking and driving areas, should be included in any stormwater collection system to be installed or upgraded at the site. The use of low impact development (LID) practices such as water quality swales and rain gardens for infiltration of stormwater on site is strongly supported. Stormwater management for parking garages typically should involve two separate collection systems designed to treat the runoff from different types of parking areas.
 - 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*— The project is not in a public water supply source area.
- b) *Groundwater*— No negatives impacts are anticipated.
- c) *Flooding*— A portion of the project site is within the 100-year flood zone on the community's Flood Insurance Rate Map. Because it is a State action, the project must be certified by the DECD as being in compliance with flood and stormwater management standards specified in section 25-68d of the Connecticut General Statutes (CGS) and section 25-68h-1 through 25-68h-3 of the Regulations of Connecticut State Agencies and receive approval from the Department. Conversion of formerly industrial property to residential use would be considered an intensive use of the floodplain. Therefore, the proposal will require an exemption under section 25-68d (d) of the CGS since the project will promote long-term intensive use of the floodplain.

In addition, residential use is a critical activity as defined in section 25-68b(4) of the CGS. In order to receive an exemption, the project must be designed so that the elevation of the lowest residential floor of the structure is one foot above the 500-year flood elevation and service facilities, such as electrical and heating systems, must be installed above the 500-year flood elevation or designed to preclude inundation during occurrence of the 500-year flood. Dry access to evacuate residents during the 500-year event must also be provided.

In order to comply with flood management standards and to be consistent with coastal management policies concerning coastal flood hazard areas, the lowest commercial floor (including basement and utilities) of the structure must: i) have the lowest floor (including basement) elevated to or above the 100-year flood level, 11 feet NGVD in this case; or (ii) together with attendant utility and sanitary facilities, be designed so that below the base flood level the structure is watertight with walls substantially impermeable to the passage of water and with structural components having the capability of resisting hydrostatic and hydrodynamic loads and effects of buoyancy.

- 3) *Disruption or alteration of an historic, archeological, cultural or recreational building, object, district, site or surroundings—*

In a letter dated April 26, 2012 the Connecticut State Historic Preservation Office (SHPO) expressed the opinion that the Norwalk Company building at 20 North Water Street is eligible for listing in the National Register of Historic Places. The SHPO indicates the proposed demolition of the structure will result in an adverse effect to the integrity of historic property. It is the opinion of the SHPO that there is no prudent or feasible alternative to proposed demolition and redevelopment of the subject property.

Several members of the public and groups including the Norwalk Preservation Trust, the Norwalk Historical Society and the Connecticut Trust for Historic Preservation submitted comments during a Public Scoping Meeting held on May 9, 2012 and throughout the Public Comment Period that the North Water Street façade of the existing Norwalk Company building has historic significance and should be preserved.

Although SHPO regrets the anticipated demolition of the Norwalk Company building and the diminishment of South Norwalk's historic setting, SHPO believe that the City and developer can implement measures that support and sustain the considerable state, federal and municipal investments in historic preservation. SHPO recommends the following measures be incorporated as conditions of the Brownfields Grant funding to mitigate the effects of the project to the historic building and the adjacent Washington Street and South Main Street Historic District:

1. The Norwalk Redevelopment Agency (RDA) will ensure that the Norwalk Company Building is subject to historic documentation prior to demolition. That documentation will be completed in accordance with the State Historic Preservation Office's standards for state-level photographic and narrative documentation and will focus on the historically significant engineering and structural elements of the historic building.
 2. The RDA will ensure that an outdoor, publically accessible interpretive exhibit is installed within the proposed courtyard of the new facilities to be constructed on the site. The exhibit will highlight the history of the Norwalk Ironworks and Norwalk Company to the development of South Norwalk.
 3. The City of Norwalk will create and host, in consultation with the Norwalk Preservation Trust and the Norwalk Historical Society a website presenting the history of South Norwalk and the history of historic preservation efforts. That website will include information concerning the experiences of former Norwalk Company employees collected from oral histories and interviews.
 4. The City of Norwalk will create a small-scale marketing campaign with a maximum cost of \$50,000 that highlights the historic character of South Norwalk. This marketing campaign may be coordinated with DECD's Office of Tourism and other efforts undertaken by the Maritime Center to attract visitors to the area. Potential elements of the campaign may include, but are not limited to kiosk advertising at Metro-North stations or radio broadcast advertisements. The intent of this campaign is to draw attention to the unique historic setting of South Norwalk and the community that makes this place one of Connecticut's great historic neighborhoods.
 5. The City of Norwalk will complete an updated historic building inventory of South Norwalk. SHPO recommends that the City of Norwalk apply for funding assistance from our Survey and Planning Grants program and that the survey be completed in consultation with the Norwalk Preservation Trust and the Norwalk Historical Society.
 6. Release of the grant funds will not proceed until the developer has an approved building permit for the proposed redevelopment.
- 4) *Effect on natural land resources and formations, including coastal and inland wetlands, and the maintenance of in-stream flows—*

The proposed project is within Connecticut's coastal boundary as defined by section 22a-94 of the CGS and is subject to the provisions of the Connecticut Coastal Management Act (CCMA), sections 22a-90 through 22a-112. If local planning and zoning approvals,

variances or building permits are required for this project, the Coastal Site Plan Review requirements of sections 22a-105 through 22a-110 of the CGS would be applicable. The municipal planning and zoning commission or designated zoning official should be consulted regarding this matter.

Coastal management concerns which should be carefully addressed in future phases of the project planning process are: avoidance or mitigation of potential flooding threats, the potential mobilization of pollutants in contaminated soils and appropriate use of urban retrofit stormwater best management practices, wherever possible.

- 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 (NDDB) contains no records of any 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 in the project area. This information is not the result of comprehensive or site-specific field investigations. Consultations with the NDDB should not be substitutes for on-site surveys required for environmental assessments.

- 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—* Several members of the public submitted comments during a Public Scoping Meeting held on May 9, 2012 and during the public comment period that the North Water Street façade of the existing Norwalk Company building is iconic to the City of Norwalk. Several members of the public expressed the demolition of the façade and new construction would have a negative aesthetic and visual impact.
- 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 proposed project is located in an area designated as a Regional Center on the Conservation & Development Policies Plan for Connecticut, 2005-2010 (C&D Plan). The goal for Regional Centers is to redevelop and revitalize the economic, social, and physical environment of the state's traditional centers of industry and commerce. The proposed project is consistent with the C&D Plan.
- 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*—

Lead-based paint concerns must be addressed in building demolition. Lead contaminated soils must be addressed in soil management. Asbestos containing materials must be addressed in building demolition. Radon testing should be conducted and radon resistant construction features should be built into the infrastructure of the new building. 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. Development plans in urban areas that entail soil excavation should include a protocol for sampling and analysis of potentially contaminated soil

A Property Transfer Program - Form III (DEP-PERD-PTP-203) was filed for the property in 2007 as required under section 22a-134a of the CGS when the environmental conditions at the establishment are unknown, or a release of hazardous waste or a hazardous substance has occurred at the establishment and any pollution from the establishment has not been remediated in accordance with the Remediation Standard Regulations (RSRs). The party signing the Form III certification agrees to investigate the parcel and remediate pollution caused by any release of a hazardous waste or a hazardous substance from the establishment in accordance with the RSRs. Oversight of the investigation and remediation of the parcel is delegated to a Licensed Environmental Professional (LEP). An Environmental Condition Assessment Form (ECAAF) that defines the environmental conditions at the parcel is also on file. The DEEP Remediation Division has no reports indicating that further action has been taken.

In addition, a Significant Environmental Hazard report for the property was filed with the DEEP in 2008 pursuant to section 22a-6u of the CGS documenting pollution in the top two feet of soil that may pose a risk to human health as a result of direct contact. The DEEP determined that the polluted soil is under a building, limiting the potential for contact; remediation to remove the polluted soil was scheduled for 2008. There has been no report that remediation was completed.

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

Following are the issues identified by various State agencies:

DEEP: A portion of the project site is within the 100-year flood zone on the community's Flood Insurance Rate Map. Because it is a State action, the project must be certified by the DECD as being in compliance with flood and stormwater management standards.

Stormwater management for parking garages typically should involve two separate collection systems designed to treat the runoff from different types of parking areas.

The disposal of demolition waste should be handled in accordance with applicable solid waste statutes and regulations.

DPH (Drinking Water Section): The project does not appear to be in a public water supply source area.

DPH (Environmental Health Section): A plan must be in place to address lead-based paint, asbestos and lead contaminated soils.

SHPO: The Norwalk Company building at 20 North Water Street is eligible for listing in the National Register of Historic Places. The SHPO indicates the proposed demolition of the structure will result in an adverse effect to the integrity of historic property. It is the opinion of the SHPO that there is no prudent or feasible alternative to proposed demolition and redevelopment of the subject property. SHPO recommends mitigation measures be incorporated as conditions of the Brownfields Grant funding to mitigate the effects of the project to the historic building and the adjacent Washington Street and South Main Street Historic District:

Conclusion:

The City of Norwalk in conjunction with North Water Street LLC (c/o Spinnaker Real Estate Partners LLC) shall be required to comply with the following conditions as a requirement for utilization of state funding for the proposed project:

- Historic:
 - The RDA will ensure that the Norwalk Company Building is subject to historic documentation prior to demolition.
 - The RDA will ensure that an outdoor, publically accessible interpretive exhibit is installed within the proposed courtyard of the new facilities to be constructed on the site.
 - The City of Norwalk will create and host, in consultation with the Norwalk Preservation Trust and the Norwalk Historical Society a website presenting the history of South Norwalk and the history of historic preservation efforts.
 - The City of Norwalk will create a small-scale marketing campaign with a maximum cost of \$50,000 that highlights the historic character of South Norwalk.
 - The City of Norwalk will complete an updated historic building inventory of South Norwalk.
 - Release of the grant funds will not proceed until the developer has an approved building permit for the proposed redevelopment.

- Flood:
 - The project must be certified by the DECD as being in compliance with flood and stormwater management standards.
 - The project must be designed so that the elevation of the lowest residential floor of the structure is one foot above the 500-year flood elevation and service facilities, such as electrical and heating systems, must be installed above the 500-year flood elevation or designed to preclude inundation during occurrence of the 500-year flood.
 - The lowest commercial floor (including basement and utilities) of the structure

must:

- i. Have the lowest floor (including basement) elevated to or above the 100-year flood level, 11 feet NGVD in this case; or
 - ii. Together with attendant utility and sanitary facilities, be designed so that below the base flood level the structure is watertight with walls substantially impermeable to the passage of water and with structural components having the capability of resisting hydrostatic and hydrodynamic loads and effects of buoyancy.
- Hazardous Waste:
 - Asbestos containing materials and lead based paint must be addressed in building demolition.

Recommendations:

DECD does not recommend preparation of an Environmental Impact Evaluation to determine the extent of cumulative impacts associated with the proposed project. The City of Norwalk in conjunction with North Water Street LLC (c/o Spinnaker Real Estate Partners LLC) shall be required to comply with the conditions described in this Environmental Assessment Checklist as a requirement for utilization of state funding for the proposed project.



**State Historic
Preservation Office**



June 18, 2012

Maya Loewenberg
Permit Ombudsman
Office of Responsible Development
Department of Economic and Community Development

Subject: Comments on the Proposed DECD Brownfields Program Grant for Remediation of 20 North Water Street, Norwalk.

Dear Ms. Loewenberg:

The State Historic Preservation Office (SHPO) provides here our comments and recommendations for the proposed remediation and redevelopment of the referenced property. The City of Norwalk in conjunction with North Water Street LLC (c/o Spinnaker Real Estate Partners LLC) is proposing the redevelopment of the former Norwalk Company site located at 20 North Water Street, Norwalk, CT. Redevelopment activities include: environmental assessment, remediation and monitoring of the 1.895 acre site; demolition of the existing 56,720 square foot brick building; and new construction of a 130,000 square foot mixed-use development consisting of 107 residential rental units and 18,000 square feet of ground floor commercial space. State funds are proposed for environmental assessment, remediation, abatement and monitoring. As stated in our previous comments, it is the opinion of the State Historic Preservation Office that the former machine shop building on the property known as the Norwalk Company Building is eligible for listing in the National Register of Historic Places and represents a significant historic asset of the City of Norwalk. It is further our opinion that the proposed demolition of the structure will result in an adverse effect to the integrity of historic property. Based on our consultations with the concerned parties and additional information provided in response to the Public Scoping meeting held on May 9th of this year, it is our opinion that there is no prudent or feasible alternative to proposed demolition and redevelopment of the subject property.

SHPO notes that public concerns with the demolition of the Norwalk Company Building were expressed at the scoping meeting and a number of recommendations were presented by the participants to address these concerns. Many members of the public including representatives of the Norwalk Preservation Trust and Norwalk Historical Society expressed concern that the historic building would be demolished to provide wider sidewalks and greater pedestrian connectivity between the Maritime Center and parking facilities located to the north of the subject property. Many participants in the Public Scoping Meeting also urged the retention of the existing brick façade and incorporation of this element in the proposed construction. We note that Spinnaker has provided a substantive response to this suggestion demonstrating that saving the façade is not feasible in light of the site constraints and intended use of the redeveloped property. Both Spinnaker and the City of Norwalk's Redevelopment Agency (RDA) have also



**State Historic
Preservation Office**



*Loewenberg – Municipal Brownfields Grant - 20 North Water Street – Norwalk
June 18, 2012
(Page 2/3)*

provided substantial information demonstrating the reasons why narrowing of North Water Street is impractical and contrary to the long-term planning for a more pedestrian friendly South Norwalk community. Although SHPO regrets the anticipated demolition of the Norwalk Company building and the diminishment of South Norwalk's historic setting, we believe that the City and developer can implement measures that support and sustain the considerable state, federal and municipal investments in historic preservation. We are therefore recommending that the following measures be incorporated as conditions of the Brownfields Grant funding to mitigate the effects of the project to the historic building and the adjacent Washington Street and South Main Street Historic District:

1. The RDA will ensure that the Norwalk Company Building is subject to historic documentation prior to demolition. That documentation will be completed in accordance with the State Historic Preservation Office's standards for state-level photographic and narrative documentation and will focus on the historically significant engineering and structural elements of the historic building.
2. The RDA will ensure that an outdoor, publicly accessible interpretive exhibit is installed within the proposed courtyard of the new facilities to be constructed on the site. The exhibit will highlight the history of the Norwalk Ironworks and Norwalk Company to the development of South Norwalk.
3. The City of Norwalk will create and host, in consultation with the Norwalk Preservation Trust and the Norwalk Historical Society a website presenting the history of South Norwalk and the history of historic preservation efforts. That website will include information concerning the experiences of former Norwalk Company employees collected from oral histories and interviews.
4. The City of Norwalk will create a small-scale marketing campaign with a maximum cost of \$50,000 that highlights the historic character of South Norwalk. SHPO notes that this marketing campaign may be coordinated with DECD's Office of Tourism and other efforts undertaken by the Maritime Center to attract visitors to the area. Potential elements of the campaign may include, but are not limited to kiosk advertising at Metro-North stations or radio broadcast advertisements. The intent of this campaign is to draw attention to the unique historic setting of South Norwalk and the community that makes this place one of Connecticut's great historic neighborhoods.



**State Historic
Preservation Office**



*Loewenberg – Municipal Brownfields Grant - 20 North Water Street – Norwalk
June 18, 2012
(Page 3/3)*

5. The City will complete an updated historic building inventory of South Norwalk. SHPO recommends that the City apply for funding assistance from our Survey and Planning Grants program and that the survey be completed in consultation with the Norwalk Preservation Trust and the Norwalk Historical Society.

SHPO's consultations with the involved parties leads us to believe that there is a shared concern with the economic future of South Norwalk and a belief that historic preservation efforts will be most successful when undertaken as part of a balanced approach to meeting the community's changing needs. The State Historic Preservation Office appreciates the opportunity to have reviewed and commented upon this Brownfields Program project. These comments are provided in accordance with the Connecticut Environmental Policy Act. For further information, please contact me at (860) 256-2761 or Daniel.Forrest@ct.gov. For additional guidance on coordination with the Office of Tourism and options for the recommended marketing campaign, please contact Rena Calcaterra at Rena.Calcaterra@ct.gov.

Sincerely,

Daniel T. Forrest
Deputy State Historic Preservation Officer

CC: Sheehan/Norwalk Redevelopment Agency
Fowler/Spinnaker
Bryant/Norwalk Preservation Trust
Westmoreland/Norwalk Historic Society
Farmer/CT Trust for Historic Preservation



**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: May 16, 2012 **E-Mail:** david.fox@ct.gov

Subject: North Water Street Redevelopment, Norwalk

The Department of Energy & Environmental Protection (DEEP) has received the Notice of Scoping for proposed environmental assessment and remediation of the former Norwalk Company site at 20 North Water Street in Norwalk to allow redevelopment including 107 residential rental units and ground floor commercial development. The following comments are submitted for your consideration.

A portion of the project site is within the 100-year flood zone on the community's Flood Insurance Rate Map. Because it is a State action, the project must be certified by the DECD as being in compliance with flood and stormwater management standards specified in section 25-68d of the Connecticut General Statutes (CGS) and section 25-68h-1 through 25-68h-3 of the Regulations of Connecticut State Agencies and receive approval from the Department. Conversion of formerly industrial property to residential use would be considered an intensive use of the floodplain. Therefore, the proposal will require an exemption under section 25-68d (d) of the CGS since the project will promote long-term intensive use of the floodplain.

In addition, residential use is a critical activity as defined in section 25-68b(4) of the CGS. In order to receive an exemption, the project must be designed so that the elevation of the lowest residential floor of the structure is one foot above the 500-year flood elevation and service facilities, such as electrical and heating systems, must be installed above the 500-year flood elevation or designed to preclude inundation during occurrence of the 500-year flood. Dry access to evacuate residents during the 500-year event must also be provided.

In order to comply with flood management standards and to be consistent with coastal management policies concerning coastal flood hazard areas, the lowest commercial floor (including basement and utilities) of the structure must: i) have the lowest floor (including basement) elevated to or above the 100-year flood level, 11 feet NGVD in this case; or (ii) together with attendant utility and sanitary facilities, be designed so that below the base flood level the structure is watertight with walls substantially impermeable to the passage of water and with structural components having the capability of resisting hydrostatic and hydrodynamic loads and effects of buoyancy.

For further information, contact the Inland Water Resources Division at 860-424-3706. A fact sheet regarding floodplain management and the certification form can be downloaded at: [Flood Management](#).

The proposed project is within Connecticut's coastal boundary as defined by section 22a-94 of the CGS and is subject to the provisions of the Connecticut Coastal Management Act (CCMA), sections 22a-90 through 22a-112. If local planning and zoning approvals, variances or building permits are required for this project, the Coastal Site Plan Review requirements of sections 22a-105 through 22a-110 of the CGS would be applicable. The municipal planning and zoning commission or designated zoning official should be consulted regarding this matter.

Coastal management concerns which should be carefully addressed in future phases of the project planning process are: avoidance or mitigation of potential flooding threats, the potential mobilization of pollutants in contaminated soils and appropriate use of urban retrofit stormwater best management practices, wherever possible.

The Department's standard recommendation concerning stormwater management which follows should be observed, as appropriate.

Appropriate controls, designed to remove sediment and oil or grease typically found in runoff from parking and driving areas, should be included in any stormwater collection system to be installed or upgraded at the site. Non-structural measures to dissipate and treat runoff are strongly encouraged, including infiltration using pervious paving or sheetflow from uncurbed pavement to vegetated swales, water gardens or depression storage areas. The Department recommends a stormwater management treatment train approach. Such a system includes a series of stormwater best management practices (BMPs) that target the anticipated pollutants of concern. For example, parking lot runoff would be expected to contain petroleum hydrocarbons, heavy metals, sediment, organic material (leaves/grass clippings) and seasonally elevated temperatures. Potential structural stormwater BMPs include, but are not limited to, catch basin inserts, gross particle separators, deep sump catch basins fitted with passive skimmers, and/or detention/retention basins having adequate pre-treatment. For larger sites, a combination of structural and non-structural BMPs are typically most effective and practical. If more than 1 acre of pavement drains to a common discharge point, a hydrodynamic separator, incorporating swirl technology, circular screening technology or engineered cylindrical sedimentation technology, is recommended to remove medium to coarse grained sediments and oil or grease. The treatment system should be sized such that it can treat stormwater runoff adequately. The Department recommends that the treatment system be designed to treat the first inch of stormwater runoff. Upon installation, a maintenance plan should also be implemented to insure continued effectiveness of these control measures.

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 Web Survey (available on-line at: [Web Soil Survey](#)), the soils at most of the property consist of urban land. These soils are unrated in their suitability for various stormwater management practices. However, infiltration practices may be suitable at this site. 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](#).

For additional information, consult the *Connecticut Stormwater Quality Manual*. The manual provides guidance for developers and engineers on the selection, design, construction and maintenance of stormwater Best Management Practices. It includes site planning concepts to reduce or disconnect impervious surfaces in order to reduce or eliminate the need for structural stormwater controls. It also addresses criteria to consider when selecting stormwater treatment practices at a particular site, including effectiveness of particular practices, land use factors, physical/site feasibility factors and downstream resources. The manual is available on-line at: [Stormwater Manual](#). A *Low Impact Development Appendix* to the manual has been prepared to provide specific guidance on low impact development techniques. It is also available on-line at: [LID Appendix](#).

The project description does not mention a parking structure as a component of the proposed redevelopment. However, if one is proposed, the following standard recommendation concerning stormwater management should be observed.

Stormwater management for parking garages typically should involve two separate collection systems designed to treat the runoff from different types of parking areas. Any exposed parking levels will produce a high volume of runoff with relatively low concentrations of pollutants. Runoff from such areas should be directed to the storm sewer system and the collection system should include controls to remove sediment and oil or grease. A hydrodynamic separator, incorporating swirl technology, circular screening technology or engineered cylindrical sedimentation technology, is recommended to remove medium to coarse grained sediments and oil or grease. The treatment system should be sized such that it can treat stormwater runoff adequately. The Department recommends that the treatment system be designed to treat the first inch of stormwater runoff. Upon installation, a maintenance plan to remove sediment and oil or grease should also be implemented.

Interior levels of the garage will produce a low volume of runoff with relatively high concentrations of pollutants. In addition, the need for cleaning of the garage must be considered and floor washwater cannot be directed to a stormwater sewer system. Runoff from interior areas should be directed to the sanitary sewer system, again with appropriate treatment. An oil separator tank with a capacity of at least 1000 gallons is required. A licensed waste oil hauler must clean the tank at least once a year. A list of certified haulers can be obtained from the Bureau of Materials Management & Compliance Assurance at 860-424-3366. The discharge of floor washwater is covered under a *General Permit for Miscellaneous Discharges of Sewer Compatible Wastewater* as building maintenance wastewater. Registration is required for discharges greater than 5000 gallons per day. For further information concerning stormwater management, contact the Permitting & Enforcement Division at 860-424-3018. A fact sheet describing the permit and the registration form may be downloaded at: [Miscellaneous Discharge GP](#).

A *Property Transfer Program - Form III* (DEP-PERD-PTP-203) was filed for the property in 2007 as required under section 22a-134a of the CGS when the environmental conditions at the establishment are unknown, or a release of hazardous waste or a hazardous substance has occurred at the establishment and any pollution from the establishment has not been remediated in accordance with the Remediation Standard Regulations (RSRs). The party signing the Form

III certification agrees to investigate the parcel and remediate pollution caused by any release of a hazardous waste or a hazardous substance from the establishment in accordance with the RSRs. Oversight of the investigation and remediation of the parcel is delegated to a Licensed Environmental Professional (LEP). An Environmental Condition Assessment Form (ECAAF) that defines the environmental conditions at the parcel is also on file. The Remediation Division has no reports indicating that further action has been taken.

In addition, a Significant Environmental Hazard report for the property was filed with the Department in 2008 pursuant to section 22a-6u of the CGS documenting pollution in the top two feet of soil that may pose a risk to human health as a result of direct contact. The Department reviewed the information provided and determined that the polluted soil is under a building, limiting the potential for contact; remediation to remove the polluted soil was scheduled for 2008. There has been no report that remediation was completed. For further information, contact Carolyn Fusaro of the Remediation Division at 860-424-4105 or carolyn.fusaro@ct.gov.

The Natural Diversity Data Base (NDDB) contains no records of any 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 in the project area. This information is not the result of comprehensive or site-specific field investigations. Consultations with the NDDB should not be substitutes 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 DEEP'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. 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.

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.

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.

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
Marcy Balint, DEEP/OLISP
Jeff Caiola, DEEP/IWRD
Carolyn Fusaro, DEEP/RD

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

Environmental Health Section

April 23, 2012

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



BY: _____

RE: Notice of Scoping for 20 North Water Street, Norwalk

Dear Mr. Hood:

A review of the scoping notice reveals limited information at this stage of the 20 North Water Street, Norwalk, CT Project. However, the project does mention redevelopment of the former Norwalk Company 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 residential rental units or commercial space.

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.
- Planned demolition or soil removal activities should be performed using lead-safe work practices.



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- 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:

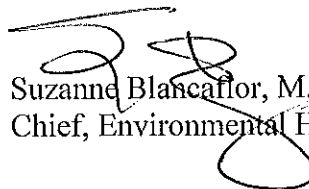
- A gas permeable layer, such as 4-inch gravel, placed beneath the slab to allow soil gases to move freely underneath the building
- Plastic sheeting over the gas permeable layer and under the slab to help prevent soil gases from entering the home
- Sealing and caulking all openings in the foundation 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

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

May 17, 2012

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

Re: Notice of Scoping for 20 North Water Street, Norwalk

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 "Eric McPhee".

Eric McPhee
Supervising Environmental Analyst
Drinking Water Section



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