



STATE OF CONNECTICUT

DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION

OFFICE OF ENVIRONMENTAL REVIEW

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To: Jason Coite - Environmental Compliance Analyst
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Date: August 18, 2014 **E-Mail:** david.fox@ct.gov

Subject: UConn Greater Hartford Campus

The Department of Energy & Environmental Protection has received the Notice of Scoping for the proposed disposition of the UConn Greater Hartford Campus on Asylum Avenue in West Hartford. The following commentary is submitted for your consideration.

According to the Flood Insurance Rate Map for West Hartford, there are floodways, 100-year flood zones, and 500-year flood zones for both East Branch Trout Brook and its tributary on the property. As defined by section 25-68b(8) of the Connecticut General Statutes (CGS), the transfer of real property belonging to the state in a floodplain is an action that requires flood management certification. Such certification would likely include restrictions on uses allowed in the flood zones. Reuse by a state agency that involves activities within the 100-year flood zone or critical activities within the 500-year flood zone would also require flood management certification pursuant to section 25-68d of the CGS.

The Natural Resources Conservation Service's Soil Survey depicts several areas of Scitico, Shaker, and Maybid soils, a regulated wetland soil, associated with East Branch Trout Brook and its tributary that flow through the property. If redevelopment of the site is contemplated, existing wetlands and watercourses at the sites should be delineated by a certified soil scientist and their functional values should be evaluated. Any development 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 work or construction activity by state agencies within the inland wetland areas or watercourses on-site will require a permit from the Inland Water Resources Division (IWRD) pursuant to section 22a-39(h) of the CGS. If the property is transferred by the state for redevelopment by another entity, inland wetlands or watercourses would be regulated by the local inland wetlands agency, pursuant to section 22a-42 of the CGS.

The main stem of Trout Brook, which is downstream of the property, from the Park Road crossing upstream to Woodbridge Lake, is listed in the *2012 State of Connecticut Integrated Water Quality Report* as not supporting aquatic life and recreation uses, due, in part, to permitted and non-permitted stormwater discharges. If the property is to be redeveloped, low impact development (LID) practices such as water quality swales and rain gardens should be employed to facilitate the infiltration of stormwater so as to help mitigate the impacts of urbanization of the

watershed. 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](#).

The Natural Diversity Data Base, maintained by DEEP, 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 site. This information is not the result of comprehensive or site-specific field investigations. Also, be advised that this is a preliminary review. 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 Natural Diversity Data Base should not be substituted for on-site surveys required for environmental assessments. The extent of investigation by competent biologist(s) of the flora and fauna found at the site would depend on the nature of the existing habitat(s).

It is suggested that an environmental or engineering consultant be retained to conduct a site investigation and sampling/testing as appropriate, in order to confirm that the property has not been the site of improper disposal of waste or does not contain some other environmental liabilities,. The investigation should include an inquiry into the historic uses, such as science laboratories, 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 CGS. For further information, contact the Remediation Division at 860-424-3705. These regulations are available on-line at: [Remediation Regulations](#).

The following standard comments regarding building demolition and renovation projects are provided for informational purposes during future planning, if the disposition leads to these activities. 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](#).

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 Regulations of Connecticut State Agencies (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](#).

During any building renovation, areas to be disturbed must be inspected for the presence of asbestos-containing materials. Any abatement project or the removal and disposal of such material must conform to Federal and State regulations. These include 40 CFR 61, Subparts A and M and section 19a-332a-1 through 19a-332a-16 of the Regulations of Connecticut State Agencies. For further information, contact the Department of Public Health at (860) 509-7367. Additional information concerning regulation of asbestos, including lists of licensed consultants and contractors, may be found at: [Asbestos Contractors](#).

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. A fact sheet regarding lead paint disposal during renovation and demolition projects can be found on-line at: [Lead Paint Fact Sheet](#). 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](#).

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 there are any questions concerning these comments, please contact me.

cc: Robert Hannon, DEEP/OPPD
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