



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

Date: May 16, 2013 **E-Mail:** david.fox@ct.gov

Subject: UConn Main Accumulation Area

The Department of Energy & Environmental Protection has received the Notice of Scoping for the Environmental Impact Evaluation (EIE) to be prepared for construction of a new centralized facility for the temporary storage of chemical, biological, medical and low-level radioactive waste at the Storrs campus. The following commentary is submitted for your consideration during preparation of the document.

Previous scoping processes in 2004 and 2008 as well as the recent advisory committee alternatives analysis have adequately identified issues that should be addressed in the EIE. The 2001 *Final Environmental Impact Statement, North Hillside Road Extension* catalogued the environmental and ecological resources of the North Campus area, including this site. The *Comparative Site Study* that resulted from the thorough evaluation of alternative sites on the campus considered these environmental and ecological resources in proximity to the site. Therefore, our comments are limited to the management of stormwater at the proposed facility.

The preferred site for the storage facility sits on the drainage divide between Eagleville Brook to the south and Cedar Swamp Brook to the north. Eagleville Brook was included on the 2004 *List of Connecticut Waterbodies Not Meeting Water Quality Standards* due to not meeting the aquatic life criteria contained in Connecticut's *Water Quality Standards*. As a result, a Total Maximum Daily Load (TMDL) analysis was completed for Eagleville Brook on February 8, 2007 that established the percent of impervious cover (IC) throughout the watershed that must be achieved to meet the aquatic life criteria and attain the designated aquatic life uses. A goal of 59% reduction in IC for this Eagleville Brook sub-watershed area is to be accomplished by improved stormwater management. New development is not prohibited by this TMDL; rather, development plans should implement stormwater management controls to maintain current site hydrology resulting in effectively no net increase in IC in the watershed. The adaptive management strategy identified includes reducing IC where practical, disconnecting IC from the surface waterbody, minimizing additional disturbance to maintain existing natural buffering capacity and installing engineered BMPs to reduce the impact of IC on receiving water hydrology and water quality.

Cedar Swamp Brook was assessed by CT DEEP and included in the list of impaired waters within the 2012 *State of Connecticut Integrated Water Quality Report*. Cedar Swamp Brook, along with Eagleville Brook are included in the *Connecticut Statewide Bacteria TMDL (2012)*

for impairment to recreation use. The impairments are due to elevated fecal indicator bacteria concentrations. Analysis of the DEEP monitoring data reveals more frequent exceedences during wet weather rather than during dry weather events, indicating a stormwater runoff-related management need for each of these watersheds.

The site is located at Parcel G of the North Campus technology park, which is presently part of the diversion permit application for the North Hillside Road extension (Application No. DIV - 201205385). The conceptual plan for the permit depicts a 45,000 sq.ft. building footprint occupying Parcel G, with runoff being conveyed northerly via a water quality swale to a stormwater management basin at Parcel F.

The stormwater collection system for the main accumulation area should be described, at least on a conceptual basis in the EIE. Factors which should be considered in its design include:

- The system should be in compliance with the parameters of the diversion permit (when it is issued) as well as the flood management certification (FM-201205381) For example, construction should be confined to the specified building and parking/driving envelopes.
- Any runoff from loading areas or other locations where a spill may occur should be directed to a stormwater collection system that can be effectively closed in the event of a spill, so that it is contained prior to discharge to the ground or the larger stormwater system.
- LID techniques may be employed for clean runoff, such as rain gardens for roof runoff or pervious pavement for walkways where hazardous material will not be handled.
- Pollution prevention measures should include regular parking lot sweeping and catch basin cleaning, along with drainage system inspections and management at the site.
- The system should incorporate construction and post-construction management strategies to address the bacteria exceedences identified in both the *Eagleville Brook Watershed Management Plan* (2011) and the *Connecticut Statewide Bacteria TMDL*.

As required by the diversion permit, construction plans for development of Parcel G must be submitted to the Department for review and construction cannot commence without written approval from the Department.

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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