



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

136 Main Street, Suite 401
New Britain, Connecticut 06051
Phone: 827-7682

Petition No 208HW
Staff Report
April 27, 1988

Connecticut Light and Power (CL&P) is requesting a determination that no Certificate of Public Safety and Necessity is required for the construction of two aboveground concrete tanks in replacement of a one acre impoundment known as Equalization Basin 2 (EB-2). This basin is part of the wastewater treatment system at the CL&P Devon Station. The project consists of the construction of two 30 foot high, 85 foot diameter, aboveground concrete free-standing tanks on the north side of the developed area of the plant. Each tank is capable of holding approximately 1.2 million gallons. The area of the proposed tank siting was previously used as a site for a 70,000 bbl oil storage tank, but is currently vacant. The new tanks will replace an existing 2.3 million gallon surface impoundment, and will have an equivalent combined volume of about 2.5 million gallons. The entire treatment system is operated under NPDES Permit #CT0003107; issued to CL&P by the CT DEP. The new tanks are needed because the existing single lined surface impoundment must be double lined or removed as mandated by the 1984 Hazardous and Solid Waste Amendments to the Resource Conservation and Recovery Act. CL&P chose to eliminate this impoundment. A non-RCRA regulated 300,000 gallon polishing basin will remain.

Siting Council members Dr. William Smith, Brian Emerick and Brian Tole, and analysts Thomas E. Fanning, Jim Walz and Fred Rein met at the site of the proposal with Northeast Utilities representatives Tom Arcari, Tom Keeney, and Jack Ranney on April 15, 1988.

CL&P contends that under 22a-115 (9) the new tanks would not constitute a modification of an existing facility. CL&P also contends that the changes would not require a new DEP or EPA permit under the hazardous waste management regulations. As part of an existing wastewater treatment system, replacement of individual components is exempted from additional DEP permitting.

Devon Station is located on the east bank of the Housatonic River in Milford CT. Portions of the shoreline are within the FEMA 100 year flood zone, to 11 foot MSL. The proposed modifications and tank additions take advantage of existing site conditions including a manmade, flood proofed depression (bermed) to 20' above MSL. This situation would protect the tanks from the 100 year flood and reduce the visual impacts of the modifications from across the river.

The proposed concrete tanks would be located approximately 500 feet north of the existing EB-2 impoundment, and 60 feet from the northerly property line. Soils in the area are well-drained (Urban Complex), and receive only intermittent drainage due to the configuration of the grading. There is no through-drainage in the area of the proposed tank location.

There are no inland or tidal wetlands in the proposed area of the tank site. CL&P will apply to the Milford Planning & Zoning Commission for Coastal Zone location approval. The proposal is consistent with the applicable policies of the Connecticut Coastal Management Act.

The review team expressed concern that the existing monitoring well system be capable of detecting discharges to the groundwater system in the event of a release to the environment from the new tanks. The review team recommended that if CL&P is required to install additional monitor wells as part of the National Pollutant Discharge Elimination System permit, they should be located inside the bermed containment area.

Construction on the tanks would be according to the submitted petition, and would commence in May 1988. The tanks would be operational by October 15, 1988. Other proposed modifications would be operational by April 1, 1989.

Fred Rein
Siting Analyst

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