



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

---

**To:** Mark W. Alexander – Transportation Assistant Planning Director  
DOT - Bureau of Policy & Planning, 2800 Berlin Turnpike, Newington

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

**Date:** June 17, 2016      **E-Mail:** [david.fox@ct.gov](mailto:david.fox@ct.gov)

**Subject:** I-84 Safety & Operational Improvements, West Hartford

---

The Department of Energy & Environmental Protection (DEEP) is responding to the Notice of Scoping for the project to add auxiliary lanes and reconstruct several bridges in the I-84 corridor in West Hartford. The following comments are submitted for your consideration.

The project corridor includes several areas where wetland soils mapped by the Natural Resources Conservation Service's Soil Survey border the highway corridor. Although the widening will occur within the highway median, noise barriers are also proposed. If there are any undeveloped areas to be impacted, it is recommended that a certified soil scientist perform a reconnaissance of the site in order to determine whether there are any areas which would be regulated as wetlands or watercourses as defined by section 22a-38 (15) and (16) of the Connecticut General Statutes (CGS), respectively. If so, the project will require an inland wetland and watercourses permit from the Inland Water Resources Division (IWRD) pursuant to section 22a-39(h) of the Connecticut General Statutes (CGS).

The project corridor also includes a crossing of the South Branch Trout Brook. The 100-year flood discharge is contained within the culvert. Any extension or alteration of the culvert would have require certification with flood and stormwater management standards specified in section 25-68d of the CGS and section 25-68h-1 through 25-68h-3 of the Regulations of Connecticut State Agencies (RCSA). However, it appears that the watershed of South Branch Trout Brook upstream of the project area is approximately 350 acres, so the project would be exempt from certification by section 25-68d(f) of the CGS.

The project will also involve highway drainage improvements. The opportunity to introduce treatment measures to the stormwater collection system as part of the project should be explored. Constraints involved in this urban location, including soil suitability, space limitations, conflicts with existing utilities, and maintenance requirements, are recognized. However, stormwater management techniques have dramatically improved since the highway was constructed, so the new collection/treatment system should result in better renovation of stormwater discharges.

The project will require registration under the *General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities* (DEEP-WPED-GP-015). Stormwater treatment systems must be designed to comply with the post-

construction stormwater performance management requirements of the permit. These include post-construction performance standards requiring retention of the water quality volume and incorporating control measures for runoff reduction and low impact development practices.

In order to mitigate potential air quality impacts from construction activities, the Department typically recommends the following measures.

For construction projects, the Department typically encourages the use of newer off-road construction equipment that meets the latest EPA or California Air Resources Board (CARB) standards. If that newer equipment cannot be used, equipment with the best available controls on diesel emissions including retrofitting with diesel oxidation catalysts or particulate filters in addition to the use of ultra-low sulfur fuel would be the second choice that can be effective in reducing exhaust emissions. The use of newer equipment that meets EPA standards would obviate the need for retrofits.

The Department also encourages the use of newer on-road vehicles that meet either the latest EPA or California Air Resources Board (CARB) standards for construction projects. These on-road vehicles include dump trucks, fuel delivery trucks and other vehicles typically found at construction sites. On-road vehicles older than the 2007-model year typically should be retrofitted with diesel oxidation catalysts or diesel particulate filters for projects. Again, the use of newer vehicles that meet EPA standards would eliminate the need for retrofits.

Additionally, Section 22a-174-18(b)(3)(C) of the Regulations of Connecticut State Agencies (RCSA) limits the idling of mobile sources to 3 minutes. This regulation applies to most vehicles such as trucks and other diesel engine-powered vehicles commonly used on construction sites. Adhering to the regulation will reduce unnecessary idling at truck staging zones, delivery or truck dumping areas and further reduce on-road and construction equipment emissions. Use of posted signs indicating the three-minute idling limit is recommended. It should be noted that only DEEP can enforce Section 22a-174-18(b)(3)(C) of the RCSA. Therefore, it is recommended that the project sponsor include language similar to the anti-idling regulations in the contract specifications for construction in order to allow them to enforce idling restrictions at the project site without the involvement of the Department.

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 in the project area. 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). If field investigations reveal any Federal or State listed species, please contact the DEEP Geologic & Natural History Survey at 860-424-3540.

The NDDDB includes all information regarding critical biologic 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, 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 NDDDB 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.

As construction commences, the discovery of hazardous materials, hazardous waste and/or contaminated soils would be a potential throughout the project corridor. A site-specific hazardous materials management plan should be developed prior to commencement of construction and a health and safety plan for construction workers should also be prepared. The Department's standard comments concerning construction projects in urban areas are submitted for your information:

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](#).

The Waste Engineering & Enforcement Division has issued a *General Permit for Contaminated Soil and/or Sediment Management (Staging & Transfer)* (DEP-SW-GP-001). 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: Jeff Caiola, DEEP/IWRD  
Lou Corsino, DEEP/APSD  
Robert Hannon, DEEP/OPPD  
Dawn McKay, DEEP/NDDB