

**State of Connecticut, Department of Public Health
Drinking Water Section, Drinking Water State Revolving Fund (DWSRF)
ENVIRONMENTAL ASSESSMENT SUMMARY**

Date:	April 11, 2013	Staff Contact:	Eric McPhee
Applicant PWS Name:	Norwalk First Taxing District	Town:	Norwalk and New Canaan
DPH DWSRF Project #:	20121030011b	PWSID:	CT1030011
Project Name:	Spring Hill Reliability Improvements Project		
Funding Source:	Drinking Water State Revolving Fund (DWSRF)		
State Funds:	\$ 7,000,000.00		

This assessment is being conducted in conformance to the generic Environmental Classification Document for Connecticut state agencies to determine Connecticut Environmental Policy Act (CEPA) obligations

Project Description: Norwalk First Taxing District (NFTD) proposes to construct/install the following components to maintain adequate water supply at the Norwalk Regional Hospital, Paradigm Healthcare Center (150 bed nursing home), DaVita of Norwalk (dialysis center) and several other medical facilities associated with the regional hospital.

Regulations of Connecticut State Agencies (RCSA) Section 22a-1a-3 Determination of environmental significance (direct/indirect)

1. Impact on air and water quality or on ambient noise levels
 - a. Air Quality – The proposed project is not expected to cause significant adverse air quality effects.
 - b. Water Quality - The proposed project is not expected to cause significant adverse water quality effects to the adjacent watercourses. The Department of Energy and Environmental Protection provided comments on possible stormwater discharge. 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](#).

- c. Ambient Noise Levels - The proposed project is not expected to cause significant noise in the immediate area;
2. Impact on a public water supply or serious effects on groundwater, flooding, erosion, or sedimentation
 - a. Water Supply - The proposed project is not expected to cause significant impacts to any public drinking water supply source water area.
 - b. Groundwater - The proposed project is not expected to cause significant impacts to neighboring groundwater.
 - c. Flooding - The proposed water main project area is within the 100-year flood zone. Based on the comments received from the Department of Energy and Environmental Protection (DEEP), the water main along Mill Road in New Canaan 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 DPH 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 (RCSA) and receive approval from the Department. 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](#).
 - d. Erosion or Sedimentation - Strict erosion and sediment controls should be employed during construction. Department of Energy and Environmental Protection provided comments on the erosion and sedimentation in order to protect wetlands and watercourses on and adjacent to the site, strict erosion and sediment controls should be employed during construction. The *Connecticut Guidelines for Soil Erosion and Sediment Control* prepared by the Connecticut Council on Soil and Water Conservation in cooperation with DEEP is a recommended source of technical assistance in the selection and design of appropriate control measures. The 2002 revised edition of the Guidelines is available online at: [Erosion Control Guidelines](#).
3. Effect on natural land resources and formations, including coastal and inland wetlands, and the maintenance of in-stream flows - If there are any undisturbed areas that will 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. DEEP provided comments to recommend development plans for utilities in urban areas that entail

soil excavation should include a protocol for sampling and analysis of potentially contaminated soil. A soil management plan should be developed for the project to deal with soils during construction. The Department's *Guidance for Utility Company Excavation* should be used as a guide in developing the plan. The guidance is available on-line at: [Utility Guidance](#) .

4. Disruption or alteration of an historic, archeological, cultural or recreational building, object, district, site or surroundings - The proposed project is not expected to cause negative impacts.
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 - Based on the comments from Department of Energy and Environmental Protection, the Natural Diversity Data Base maintained by DEEP contains no record of extant populations of Federally listed endangered or threatened species, pursuant to section 26-306 of the CGS, as endangered, threatened or special concern in the project area.
6. Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to create extensive detrimental environmental impact – No significant impact expected. Soil sampling around the project site was conducted to determine the presence of Lead-Based Paint and Polychlorinated Biphenyls (PCBs) materials. See **2013-02-22 Norwalk FTD** for soil assessment and sample test results. Soil remediation will be conducted by the City to remove the contaminated soil from the identified area. The City of Norwalk is currently working with USEPA Region I, State Department of Energy and Environmental Protection (DEEP), and Local agencies regarding the necessary permitting requirements for soil remediation. Inspection of the existing facilities for asbestos has been completed. See attached asbestos inspection summary report **2013-03-08 Norwalk FTD Final Report** prepared by ZUVIC.CARR and Associates. See attached **DPH 2013-03-20 DPH correspondence email** for comments/concerns associated with the summary report. See attached **2013-03-22 Norwalk FTD response to DPH comments**. Based on the review of the information submitted, it has been determined that the National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61, Subpart M) requirement to conduct a thorough inspection to determine the presence of asbestos prior to the commencement of the demolition of this facility has been satisfied. See attached **DPH 2013-03-26 Norwalk FTD-DPH correspondence email**.
7. Substantial aesthetic or visual effects - Due to the nature and timeframe of the project construction, the project is not expected to cause substantial aesthetic or visual impacts in the area.
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 - No significant impact expected.
9. Disruption or division of an established community or inconsistency with adopted municipal or regional plans - No significant impact expected.
10. Displacement or addition of substantial numbers of people - No significant impact expected.

11. Substantial increase in congestion (traffic, recreational, other) – The proposed project is not expected to create substantial traffic congestion in the area.
12. A substantial increase in the type or rate of energy use as a direct or indirect result of the action - No significant impact expected.
13. The creation of a hazard to human health or safety - The project is not expected to create significant public hazard and safety.
14. Any other substantial impact on natural, cultural, recreational or scenic resources - No significant impact expected.

Conclusions:

The City of Norwalk must obtain all necessary permits and/or approvals from Federal, State, and Local agencies prior to the commencement of the demolition of the existing tank and booster pumping station, and project construction. Based on the comments provided by the Department of Energy & Environmental Protection (DEEP) dated February 7, 2013, it has been determined that the proposed Spring Hill Reliability Project does not require the preparation of an Environmental Impact Evaluation under CEPA. The DPH will coordinate the project with the Town of Norwalk and New Canaan to ensure that the DEEP's recommendations will be implemented.

Recommendations:

Since the water main is to be tested and disinfected after installation, the discharge would be covered by the *General Permit for the Discharge of Hydrostatic Pressure Testing Wastewater* (DEP-PERD-GP-011). This general permit applies to all discharges of waters used to test the structural integrity of new or used tanks and pipelines that hold or transfer drinking water, sewage, or natural gas. The general permit contains pH, chlorine, oil and grease, and suspended solids limits which will need to be complied with during the testing and verified through monitoring. Registration is required to be submitted to the DEEP in order for the discharges to be authorized by this general permit. For further information, please contact the DEEP at 860 424-3018 or visit its website at: www.ct.gov/deep/

Prior to starting the project construction, the following best management practices should be considered:

1. **Construction Maintenance:** No construction should take place before erosion and sedimentation controls are installed. These controls should be properly installed, maintained, inspected regularly, and remain in place until the project construction is completed. During construction and until a vegetative cover is reestablished, the project area should be inspected daily and after rainfall to verify erosion control measures are properly functioning. Any defects on the structure must be immediately repaired.

2. **Emergency Response Plan:** Develop an Emergency Spill Response Plan before construction begins. Spill response equipment should be available on-site at all times along with personnel trained in the proper use of such equipment.
3. **Hazardous Materials Storage:** Hazardous materials should be removed from the site during non-work hours or otherwise stored in a secure area to prevent vandalism. Place covered trashcans and recycling receptacles around the site. Cover and maintain dumpsters. Check frequently for leaks. Place dumpsters under a roof or cover with tarps or plastic sheeting. Never clean a dumpster by hosing it down on site.
4. **Vehicles and Machinery:** Methods and locations of refueling, servicing, and storage of vehicles and machinery should be addressed and included as notes on the final site plans. All equipment fueling or minor repairs should occur on a fueling pad. Onsite fuel storage for heavy equipment should have containment and be located in a secure area where it will not be vandalized or struck by equipment or vehicles on the job site.
5. **Sanitation:** Portable toilets should be provided on site. The toilets should be properly maintained to ensure that leaks will be prevented.