



RECORD OF ENVIRONMENTAL CONSIDERATION



Division of
Construction Services

PROPOSED PROJECT/ACTION INFORMATION:

Project Title: Asnuntuck Community College New Manufacturing Center
Project Address: 170 Elm Street, Enfield
Sponsoring Agency: Connecticut State Colleges and Universities (Board of Regents)
Sponsoring Agency Representative: Keith Epstein
DCS Project Manager: Lisa Humble
DCS Project Number: BI-CTC-488
Project/Action Description: New building approx. 27,000 SF for manufacturing technologies; additional parking.

CONNECTICUT ENVIRONMENTAL POLICY ACT (CEPA) APPLICABILITY:

Environmental Classification Document (ECD): Proposed Action meets the potential square footage under Category II a. of the Generic ECD.

Determination of Environmental Significance: After Early Public Scoping and review of agency comments, and response to the submitted comments, it has been determined that the subject project does not rise to the level of significance. See attached response to comments and actual comments submitted.

Was early public scoping conducted? Yes
If yes, list date: May 19, 2015

Was the proposed project/action covered under an existing CEPA document? No
If yes, list project title, project number, and date:

BASED ON THE ABOVE INFORMATION THE PROPOSED PROJECT:

- is excluded or exempt from the requirements of CEPA; or
 has been adequately assessed in existing documents (environmental review) and has been determined not to be environmentally significant; therefore, an Environmental Impact Evaluation is not necessary at this stage of the project. However, if the project scope should significantly change, then an updated review should be conducted.

Prepared by:

Environmental Analyst
DCS Environmental Planning

Date

10/30/15

Early Public Scoping Comments and Responses
Connecticut Environmental Policy Act (CEPA)

Asnuntuck Community College New Manufacturing Technology Center
June 25, 2015

Comments Received

An early public scoping process was conducted for the Asnuntuck Community College New Manufacturing Technology Center in accordance with the requirements of the Connecticut Environmental Policy Act (CEPA). A Notice of Scoping for the project was published in the May 19, June 2, and June 16, 2015 editions of the Council on Environmental Quality *Environmental Monitor* for public and agency review and comment. Written comments were received during the 30-day comment period, which ended on June 18, 2015. A Public Scoping Meeting was not held during the comment period since a meeting was not requested by 25 or more individuals, or by an association that represents 25 or more members.

This document contains the public and agency comments received during the early public scoping process, including responses to the substantive comments received. Comments were received from the following agencies:

- Connecticut Department of Energy and Environmental Protection (June 18, 2015 Letter)
- Connecticut Department of Public Health – Drinking Water Section (June 18, 2015 Letter)

Copies of the comment letters are attached.

Response to Comments

Responses to the scoping comments are provided below. Specific comments are numbered in the margins of the comment letters, where appropriate. The comment numbers are referenced in the corresponding responses.

Connecticut Department of Energy and Environmental Protection (June 18, 2015 Letter)

Comment 1

A Flood Management Certification application for the project has been submitted to the DEEP and is currently pending approval.

Comment 2

The project design will incorporate a series of stormwater water quality basins to treat the full Water Quality Volume from the project area, consistent with the post-construction treatment performance standards contained in the CTDEEP General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities (Construction General Permit). The basins will also provide detention of peak runoff rates for larger storms to meet flood management certification requirements. The stormwater management system has also been designed to address the existing over-capacity drainage system on the eastern side of the project site

by directing runoff from the project area to the western drainage system, which has sufficient capacity.

A Permit Registration Application has been submitted to CT DEEP and is currently under review.

Comment 3

Wastewater discharges from the new facility will be covered under an appropriate CTDEEP general permit, such as the General Permit for Miscellaneous Discharges of Sewer Compatible (MISC) Wastewater.

Comment 4

No floor drains are proposed in the new facilities.

Comment 5

Contract documents will contain provisions for addressing potentially contaminated soil that may be encountered during construction. Special waste and other waste materials will be managed and disposed of in accordance with the applicable regulations and with CTDEEP approval.

Comment 6

As part of the permitting process it has been determined that further review under the CTDEEP Natural Diversity Data Base program is not necessary, as the project is not location within a 1/4 mile radius of a NDDB area.

Comment 7

The new building will meet the Connecticut Office of Policy and Management and the Division of Construction Services High Performance Building Construction Standards for State Funded Buildings in accordance with Connecticut General Statutes (CGS) § 16a-38k.

Comment 8

Use of alternative fuels for transportation – the conduit and future station area for electric vehicle charging has been incorporated into the project in case future demand justifies installing the actual equipment.

Comment 9

Construction equipment air emissions controls; use of newer or retrofitted on-road construction vehicles. All DCS projects are required to meet DCS's Diesel emission control specifications.

Comment 10

As part of the DCS's diesel emission specifications, anti-idling requirements are included.

Connecticut Department of Public Health (June 18, 2015 Letter)

The June 18, 2015 letter indicated that the DPH Drinking Water Section has no comments at this time.



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

To: Jeffrey Bolton - Supervising Environmental Analyst
DAS - Division of Construction Services, 165 Capitol Avenue, Hartford

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

Date: June 18, 2015 **E-Mail:** david.fox@ct.gov

Subject: Asnuntuck Community College, Enfield

The Department of Energy & Environmental Protection has reviewed the Notice of Scoping for proposed construction of a new manufacturing technology center and expanded parking lot at the Asnuntuck Community College campus in Enfield. The following comments are submitted for your consideration.

The project site is not within the 100-year or 500-year flood zone on the community's Flood Insurance Rate Map. There are no inland wetland soils within the project site according to the Natural Resources Conservation Service's Soil Web Survey.

Because it is an activity as defined in section 25-68b(1) of the Connecticut General Statutes (CGS), the project will require flood management certification regardless of its location in relation to the floodplain. An "activity" includes any proposed state action that impacts natural or man-made storm drainage facilities that are located on property that the commissioner determines to be controlled by the state. The project must therefore be certified by the sponsoring agency as being in compliance 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) and receive approval from the Department.

The Department strongly supports the use of low impact development (LID) practices such as water quality swales and rain gardens for infiltration of stormwater on site. Key strategies for effective LID include: managing stormwater close to where precipitation falls; infiltrating, filtering, and storing as much stormwater as feasible; managing stormwater at multiple locations throughout the landscape; conserving and restoring natural vegetation and soils; preserving open space and minimizing land disturbance; designing the site to minimize impervious surfaces; and providing for maintenance and education. Water quality and quantity benefits are maximized when multiple techniques are grouped together. Consequently, we typically recommend the utilization of one, or a combination of, the following measures:

- the use of pervious pavement or grid pavers (which are very compatible for parking lot and fire lane applications), or impervious pavement without curbs or with notched curbs to direct runoff to properly designed and installed infiltration areas,
- the use of vegetated swales, tree box filters, and/or infiltration islands to infiltrate and treat stormwater runoff (from building roofs, roads and parking lots),

1

2

- the minimization of access road widths and parking lot areas to the maximum extent possible to reduce the area of impervious surface,
- if soil conditions permit, the use of dry wells to manage runoff from the building roofs,
- the use of vegetated roofs (green roofs) to reduce the runoff from buildings,
- incorporation of proper physical barriers or operational procedures to prevent release of pollutants from special activity areas (e.g. loading docks, maintenance and service areas, dumpsters),
- the installation of rainwater harvesting systems to capture stormwater from building roofs for the purpose of reuse for irrigation, and
- providing for pollution prevention measures to reduce the introduction of pollutants to the environment.

The effectiveness of various LID techniques that rely on infiltration depends on the soil types present at the site. According to the Natural Resources Conservation Service's Soil Web Survey, the soils at the property are classified as udorthents/urban land complex. These soils are not rated for stormwater management practices utilizing infiltration. However, infiltration practices may be suitable at this site. Test pits should be dug in areas planned for infiltration practices to verify soil suitability and/or limitations. Planning should insure that areas to be used for infiltration are not compacted during the construction process by vehicles or machinery. The siting of areas for infiltration must also consider any existing soil or groundwater contamination. Even if infiltration is limited at a site, it is still possible to implement LID practices such as green roofs on buildings or the use of cisterns to capture and reuse rainwater.

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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](#).

Stormwater discharges from construction sites where one or more acres are to be disturbed, regardless of project phasing, require an NPDES permit from the Permitting & Enforcement Division. The *General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities* (DEEP-WPED-GP-015) will cover these discharges. The construction stormwater general permit dictates separate compliance procedures for Locally Approvable projects and Locally Exempt projects (as defined in the permit). Locally Exempt construction projects, such as this project, disturbing over 1 acre must submit a registration form and Stormwater Pollution Control Plan (SWPCP) to the Department. The SWPCP must include measures such as erosion and sediment controls and post construction stormwater management. 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. The general permit also requires that post-construction control measures incorporate runoff reduction practices, such as LID techniques, to meet performance standards specified in the permit.

Depending on the type and volume of wastewater that will be generated in the proposed new facility and discharged to the Enfield sanitary sewer system, a pretreatment permit or registration under a general permit may be required. These may include boiler blowdown or discharges from the manufacturing technology program or educational laboratories.

3

The *General Permit for Miscellaneous Discharges of Sewer Compatible (MISC) Wastewater* (DEEP-WPED-GP-012) covers several types of discharges to the sanitary sewer. The general permit categorizes discharges into three discharge groups. Group I discharges include air compressor condensate or blowdown, boiler blowdown, contact cooling and heating wastewater, cutting and grinding wastewater, non-destruct testing rinsewater, printing and photo processing wastewater, tumbling or cleaning of parts wastewater, water treatment wastewater, and other formerly undesignated miscellaneous wastewater. Group II discharges include non-contact cooling water, hydrostatic pressure testing wastewater, commercial laundry wastewater, and food processing wastewater. Group III discharges include building maintenance wastewater, fire suppression testing wastewater, and swimming pool wastewater. The general permit authorizes discharges to a Publicly Owned Treatment Works (POTW or sewage treatment plant) either directly via a sanitary sewer, or to a holding tank that meets the requirements of the general permit. The wastewater in the holding tank must then be transported to a POTW by a properly licensed transporter. There is no limit under the general permit to the maximum daily flow of the wastewater as long as the POTW receiving the discharge has approved the flow. Registration under the Miscellaneous General Permit is required for: 1) Group I discharges that have a cumulative maximum daily flow greater than 1000 gallons per day or 2) Group II discharges that have a cumulative maximum daily flow greater than 5000 gallons per day. For discharges less than the above-stated flows or any Group III discharges, registration is not required, although such discharges are required to comply with this general permit. In addition, depending on the flow and/or whether treatment of the wastewater is required to meet the effluent limits of the Miscellaneous General Permit, registration followed by a written approval from the Department may be required for the discharges to be authorized by this general permit. See the actual general permit for complete requirements. A fact sheet, the general permit, a guidance document and registration forms may be downloaded at: [Miscellaneous Discharge GP](#).

3

Floor drains in facilities such as laboratories and workshops are discouraged. If a floor drain is necessary, appropriate treatment controls should be installed prior to any discharge to the sewer system. The discharge of floor drain wastewater to surface water or to the ground (dry well) is not allowed. If hookup to a sewer system is not feasible, discharge to a holding tank would be required. For further information concerning appropriate controls and potential permit requirements, contact the Permitting & Enforcement Division at 860-424-3018.

4

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 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](#).

5

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.

6

Pursuant to Section 16a-38k of the CGS, as amended by Section 19 of Public Act 14-94, the Department is developing regulations requiring new construction of a state facility that is projected to cost more than \$5.0 million or renovation of a state facility that is projected to cost \$2.0 million or more to comply with state building construction standards that achieve at least seventy-five points on the United States EPA's national energy performance rating system, as determined by said agency's Energy Star Target Finder tool. If such facility cannot be defined as an eligible building type as determined by the Target Finder tool, it must exceed the energy building construction standards set forth in the 2007 edition of the American Society of Heating, Ventilating and Air Conditioning Engineers (ASHRAE) Standard 90.1 by not less than twenty per cent, or adhere to the current State Building Code, whichever is more stringent. The Department recommends that the college design any future construction that meets these thresholds to comply with these energy performance standards.

7

In keeping with the Department's interest in furthering the use of alternate fuels for transportation purposes in order to reduce emissions of greenhouse gases, ozone precursors, particulate matter and toxic air pollutants, we recommend that Level 2 electric vehicle charging stations be installed for use by students and staff. Increasing the availability of public charging stations will facilitate the introduction of the electric vehicle technology into the state and serve to alleviate the present energy dependence on petroleum and improve air quality.

8

For construction projects, the Department typically recommends 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 recommends 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.

9

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.

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Thank you for the opportunity to review this project. If there are any questions concerning these comments, please contact me.

cc: Robert Hannon, DEEP/OPPD
Jeff Caiola, DEEP/IWRD
David Kalafa, DEEP/BETP
Ellen Pierce, DEEP/APSD
Peter Ploch, DEEP/PED

STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH

Jewel Mullen, M.D., M.P.H., M.P.A.
Commissioner



Dannel P. Malloy
Governor
Nancy Wyman
Lt. Governor

June 18, 2015

Jeff Bolton
Supervising Environmental Analyst
DAS Division of Construction Services
165 Capitol Avenue, Room 483
Hartford, CT 06106

Re: Notice of Scoping for the Asnuntuck Community College New Manufacturing Technology Center

Dear Mr. Bolton:

The Drinking Water Section of the Department of Public Health has reviewed the above-mentioned project for potential impacts to any sources of public drinking water supply. This project does not appear to be in a public water supply source water area; therefore, the Drinking Water Section has no comments at this time.

Sincerely,

A handwritten signature in black ink, appearing to read "Patricia Bisacky".

Patricia Bisacky
Environmental Analyst 3
Drinking Water Section



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