Connecticut Department of
ENERGY &
ENVIRONMENTAL
PROTECTION

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To: Eric McPhee, Department of Public Health
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From: Linda Brunza- Environmental Analyst **Telephone:** 860-424-3739

Date: 1/15/2019 **Email**: Linda.Brunza@ct.gov

Subject: Scoping Notice for South Central Regional Water Authority to construction one million gallon concrete tank in the vicinity of Nutmeg Avenue, Derby.

The Department of Energy and Environmental Protection (DEEP) has received the Notice of Scoping for the project proposed by the Department of Public Health for financial assistance to the South Central Regional Water Authority to construct a million gallon water storage tank. The tank will be 51 ft. in diameter and 57 ft. tall. The tank will require 175 feet of piping from the site to the intersection of Nutmeg Avenue and Chatfield Street. Proposed construction includes an access drive from Chatfield Street to the tank site and a secondary unpaved access road from Coon Hollow Road, with a paved parking area for use by the City of Derby.

Hydrostatic Pressure Testing Wastewater Discharge
Hydrostatic pressure testing wastewater discharges resulting from this project are authorized as "potable water system maintenance wastewaters" under the *Comprehensive General Permit for Discharges to Surface Water and Groundwater* (Comprehensive General Permit). No formal registration is required under the Comprehensive General Permit for this discharge but operating conditions and effluent limits of the Comprehensive General Permit must be complied with. The Miscellaneous and Comprehensive General Permits are administered by the Water Permitting and Enforcement Division of DEEP's Bureau of Materials Management and Compliance Assurance. A general permit sets terms and conditions for conducting an activity. Questions can be directed to Don Gonyea, 860-424-3827, donald.gonyea@ct.gov; or Jim Creighton, 860-424-3681, james.creighton@ct.gov.

Idling
Section 22a-174-18(b)(3)(C) of the Regulations of Connecticut State Agencies (RCSA) limits the idling of mobile sources to three 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. DEEP recommends the use of posted signs indicating the three-minute idling limit. It should be noted that only DEEP can enforce Section 22a-174-18(b)(3)(C) of the RCSA. Therefore, DEEP recommends that the project sponsor include language similar to the anti-idling regulations in the contract specifications for construction in order to enable the sponsor to enforce idling restrictions at the project site without the involvement of DEEP.

Clean Vehicles

DEEP typically recommends the use of newer off-road construction equipment that meets the latest EPA or California Air Resources Board (CARB) standards. If 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.

DEEP also recommends the use of newer on-road vehicles that meet either the latest EPA or 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. The use of newer vehicles that meet EPA standards would eliminate the need for retrofits.

Low Impact Development

Proposed construction for the water storage tank includes an access road and paved parking lot. DEEP recommends utilizing low impact development techniques in the design. The use of pervious pavement or grid pavers are compatible for parking lots. Impervious pavement installed without curbs allows sheetflow, or with notched curbs will direct runoff to properly designed and installed infiltration areas.

Thank you for the opportunity to review this project. These comments are based on the reviews provided by relevant staff and offices within DEEP during the designated comment period. They may not represent all applicable programs within DEEP. Feel free to contact me if you have any questions concerning these comments.

cc: Robert Hannon, DEEP/ OPPD