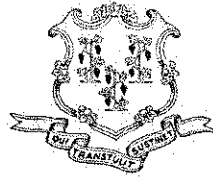


STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH



Raul Pino, M.D., M.P.H.
Commissioner

Dannel P. Malloy
Governor
Nancy Wyman
Lt. Governor

Environmental Health Section

December 2, 2016

Binu Chandy
CT Department of Economic and Community Development
505 Hudson Street
Hartford, CT 06016

RE: Notice of Scoping for Montgomery Mills Redevelopment Project, Windsor Locks

Dear Ms. Binu:

A review of the scoping notice reveals limited information at this stage of the proposal to remediate and redevelop the historic Montgomery Mill buildings. However, the project mentions needing remediation; therefore, a plan must be in place to address lead-based paint, asbestos and lead contaminated soils since these types of construction activities could result in the disturbance of surfaces that may contain lead-based paint, asbestos and/or lead contaminated soils. The project does mention housing development with approximately 160 residential units. The construction plans should include radon resistant features for occupied spaces.

The following summarizes the Department's position with regard to lead, asbestos, and radon:

A. Lead-Based Paint:

It does not appear that renovation or demolition activities that may be associated with this project are subject to the Department of Public Health (DPH), Childhood Lead Poisoning Prevention and Control Regulations (§§19a-111-1 through 19a-111-11). However, there are other issues that must be addressed related to lead-based paint. Among these issues are the following:

- Testing of paint on existing structures marked for demolition or testing for lead in soils should be performed by a lead inspector or lead inspector/risk assessor certified by the DPH.
- Planned demolition or soil removal activities should be performed using lead-safe work practices.



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- If lead-based paint or lead contaminated soil is identified, the classification and disposal of generated waste must comply with the Resource Conservation Recovery Act (RCRA) and Connecticut Department of Environmental Protection standards (e. g., Toxicity Characteristics Leaching Procedure [TCLP] testing, reporting, and record keeping requirements).
- Additionally, if lead-based paint, lead containing paint, or lead contaminated soil is identified, workers must be trained (as a minimum) according to the Occupational Safety and Health Administration (OSHA) lead standards (29 CFR 1926.62).
- Because other contaminants may also be present on the site, additional health and safety training may be required (e. g., hazardous waste and/or asbestos).

Additional inquiries on the subject of lead-based paint can be directed to Krista Veneziano of the Lead Poisoning Prevention and Control Program at (860) 509-7299.

B. Asbestos Program:

The demolition of an existing building in conjunction with this project may impact asbestos-containing materials. As required by the asbestos National Emission Standards for Hazardous Air Pollutants (40 C.F.R. Part 61, Subpart M) and in order to ensure compliance with DPH regulations, a thorough inspection must be conducted to determine the presence of asbestos prior to the commencement of the planned demolition activity. A DPH licensed asbestos consultant, with certification as an Inspector, must be hired to conduct such an inspection. If asbestos is identified, it must be abated prior to being impacted by demolition. A DPH licensed asbestos contractor must be hired to conduct asbestos abatement that involves more than three (3) linear feet or more than three (3) square feet of asbestos-containing material. Additionally, the DPH must be provided with notification prior to asbestos abatement that involves greater than ten (10) linear feet or greater than twenty-five (25) square feet of asbestos-containing material. Asbestos abatement must be performed in accordance with all applicable federal, state and local regulations.

Additional inquiries on the subject of asbestos abatement can be directed to Stephen Dahlem, Environmental Analyst 3 of the Asbestos Program at 860-509-7365.

C. Radon

The Connecticut Department of Public Health Radon Program recommends that during the construction of an occupied building, radon resistant features should be built into the infrastructure of the building.

The list below describes the basic components of radon resistant new construction:

- A gas permeable layer, such as 4-inch gravel, placed beneath the slab to allow soil gases to move freely underneath the building
- Plastic sheeting over the gas permeable layer and under the slab to help prevent soil gases from entering the home
- Sealing and caulking all openings in the foundation floor to reduce soil gas entry

- A vent pipe, such as 6 inch PVC pipe, to run from the gas permeable layer through the building to the roof to safely vent soil gases above the building
- An electrical junction box installed in case an electric venting fan is needed later

The new building should be tested for radon after construction is completed. If radon results are at or above 4.0 picocuries per liter (pCi/L), the existing system should be activated by installing an in-line fan.

Additional inquiries on the subject of radon resistant new construction can be directed to Allison Sullivan, Environmental Analyst 3 of the Radon Program at 860-509-7299.

Sincerely,

A handwritten signature in black ink, appearing to read 'Suzanne Blancaflor', with a long horizontal line extending to the left and a large loop on the right.

Suzanne Blancaflor, M.S., M.P.H.
Chief, Environmental Health Section