To: Francisco Fadul, Transportation Supervising Engineer
From: Linda Brunza, Environmental Analyst
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Date: 10/20/2023

Subject: Scoping Notice for Replacement of Bridge No. 00853, Route 16 over Salmon River, East Hampton, CT

The Department of Energy and Environmental Protection (DEEP) has received the scoping notice for the project sponsored by the Department of Transportation (DOT) for the replacement of Bridge No. 00853 located on Route 16 over the Salmon River, East Hampton, Connecticut.

Bridge No. 00853 was constructed in 1932 and reconstructed in 1986. It is comprised of a concrete encased steel girder and reinforced concrete deck superstructure supported on reinforced concrete abutments, wingwalls and a central pier.

The purpose of the project is to address the structural deficiencies and to provide a structure that accommodates safe travel. The proposed replacement bridge will be a steel plate girder structure with integral abutments and have a span length of 150 feet. It also includes a widening of the roadway to provide a 32-foot curb-to-curb width. Right of way impacts associated with the project include temporary construction easements on each side of the bridge.

Construction is anticipated to begin April of 2026 based on the availability of funding, acquisition of rights of way, and approval of permit(s).

The following comments are submitted for your consideration. The first section contains information on DEEP's regulatory programs that may require permits for the Project. There will be information linked to DEEP's website as well as contact information. The links and contacts are there to help guide the applicant and sponsoring agency to determine if permits are required after the Project moves closer to design and construction. These comments are meant to provide an overall analysis of the area, since scoping notices tend to be at the beginning stages of a project with no set design plans. After the list of potential permits, there will be comments from various divisions that are meant for informational purposes and best management practices.

Permitting/ Regulatory Programs

Water Quality Permitting, U.S. Army Corps of Engineers and DEEP
Contact: Bill Sigmund, Supervising Analyst, Land and Water Resources Division, William.Sigmund@ct.gov.

DOT is coordinating this Project with DEEP during regular agency meetings with the Land and Water Resources Division. Since the Project involves the construction of a cofferdam, DOT will apply to the Army Corps of Engineers for potential permitting. Flood Management Certification will be required due to the site being within a 100-year floodplain.

Natural Diversity Database
Contact: Robin Blum, Supervising Wildlife Biologist, Robin.Blum@ct.gov

The Natural Diversity Database is a record of state or federal listed species maintained by the Wildlife Division. This Project is located within a Natural Diversity Database area. DOT should submit an application and all required attachments to the NDDB for further review closer to the construction timeframe. A preliminary review letter was provided to DOT in September 2022. The preliminary determination listed the potential species that were on the Project site and best management practices for mitigation. In this letter, it was noted that a plan for freshwater mussel protection must be developed and submitted to NDDB. The field work for freshwater mussels should be conducted by a qualified invertebrate biologist and include anticipated impacts and mitigation. It was noted that if biological surveys are required, they will need to be conducted during the active season from May to September. For a biologist to conduct mitigation work, a DEEP Scientific Collectors Permit will be required by the Wildlife Division. Additional information concerning NDDB reviews, and the request form may be found on-line at NDDB Requests.

Fisheries Division
Contact: Bruce Williams, Fisheries Biologist, Bruce.Williams@ct.gov

The Fisheries Division conducted a preliminary review of this Project during the time when DOT was looking to just replace the superstructure. DOT should continue to consult and update Fisheries as Project plans progress. With the modifications proposed in the scoping notice, Fisheries offers the following recommendations:

1. The existing bridge is passable to fish and the channel under the bridge is composed of natural substrate, any new structure should maintain those conditions.
2. To protect Atlantic Salmon and Sea Lamprey migrations, plus the trout fishery and stockings, all unconfined in-water work should be restricted to the period from July 1 - September 30, inclusive. During the period from April 1 to June 30, this prohibition should include the installation and removal of water control structures such as cofferdams.
3. During the entire construction period at least 50% of the channel under the bridge should be open to the passage of fish and water.

4. To compensate for the loss of the center pier, a single boulder cluster should be placed mid-channel both upstream and downstream of the culvert.
5. All BPMs for siltation and erosion control should be observed during construction and upon completion all disturbed areas should be replanted with native vegetation.

Stormwater Management During Construction
Contact: DEEP.StormwaterStaff@ct.gov.

The General Permit for Stormwater and Dewatering Wastewaters from Construction Activities may be applicable depending on the size of the disturbance regardless of phasing. This general permit was created to address rainfall runoff (i.e., stormwater) from sites under construction in order to reduce or eliminate the discharge of sediment from the site during construction, as well as addressing discharges of other stormwater pollutants from the site in the long term. The construction stormwater general permit dictates separate compliance procedures for locally exempt projects (projects primarily conducted by government authorities) and locally approvable projects (projects primarily by private developers). This general permit applies to discharges of stormwater and dewatering wastewater from construction activities where the activity disturbs more than an acre. The requirements of the current general permit include registration to obtain permit coverage and development and implementation of a Stormwater Pollution Control Plan (SWPCP). The SWPCP contains requirements for the permittee to describe and manage their construction activity, including implementing erosion and sediment control measures as well as other control measures to reduce or eliminate the potential for the discharge of stormwater runoff pollutants (suspended solids and floatables such as oil and grease, trash, etc.) both during and after construction. A goal of 80 percent removal of the annual sediment load from the stormwater discharge shall be used in designing and installing post-construction stormwater management measures. Stormwater treatment systems must be designed to comply with the post-construction stormwater management performance requirements of the permit. These include post-construction performance standards requiring retention and/or infiltration of the runoff from the first inch of rain (the water quality volume or WQV) and incorporating control measures for runoff reduction and low impact development practices.

Projects that are exempt from local permitting that disturb over one acre must submit a registration form and Stormwater Pollution Control Plan (SWPCP) to DEEP at least 60 or 90 days, as identified in the permit, prior to the initiation of construction. Locally Approvable construction projects with a total disturbed area of one to five acres are not required to register with DEEP provided the development plan has been approved by a municipal land use agency and adheres to local erosion and sediment control land use regulations and the CT Guidelines for Soil Erosion and Sediment Control. In addition to measures such as erosion and sediment controls and post-construction stormwater management, the SWPCP must include a schedule for plan implementation and routine inspections. The construction stormwater general permit registrations must be filed electronically through DEEP's ezFile Portal. Additional information can be found on-line at: Construction Stormwater GP.

Information / Best Management Practices

Aquifer Protection
Staff from DEEP reviewed the location of this project and found that it is not in an aquifer protection area and has no comments on the proposed Project.

Watershed Management
The proposed bridge replacement crosses the Salmon River, a waterbody characterized as fully supporting aquatic life and recreation. The Salmon River watershed is recognized by the US Fish and Wildlife Service as the best example of a cold-water stream in Connecticut. To protect the water quality of the Salmon River proper management of stormwater and sediment should be taken during demolition and construction phases. The increase in the bridge footprint due to widening should consider measures to reduce the impact of stormwater runoff from the bridge flowing directly into the Salmon River. Please consider reviewing the following documents, which include stream crossing guidelines:
Salmon River Watershed Conservation Action Plan:
https://www.easthamptonct.gov/sites/g/files/vyhlif7556/f/uploads/salmonriverreport.pdf

Bridge crossing design work that would include dry land/terrestrial wildlife passage on both shores of the river could provide full support for aquatic habitat designated use in this interconnected river corridor system.

Solid Waste Disposal
The disposal of demolition waste should be handled in accordance with applicable solid waste statutes and regulations. Demolition debris may be contaminated with asbestos, lead-based paint or chemical residues and require special disposal. Clean fill is defined in section 22a-209-1 of the Regulations of Connecticut State Agencies (RCSA) and includes only natural soil, rock, brick, ceramics, concrete and asphalt paving fragments. Clean fill can be used on site or at appropriate off-site locations. Clean fill does not include uncured asphalt, demolition waste containing other than brick or rubble, contaminated demolition wastes (e.g., contaminated with oil or lead paint), tree stumps, or any kind of contaminated soils. Land clearing debris and waste other than clean fill resulting from demolition activities is considered bulky waste, also defined in section 22a-209-1 of the RCSA. Bulky waste is classified as special waste and must be disposed of at a permitted landfill or other solid waste processing facility pursuant to section 22a-208c of the CGS and section 22a-209-2 of the RCSA. Additional information concerning disposal of demolition debris is available on-line at Demolition Debris.

Construction and demolition debris should be segregated on-site and reused or recycled to the greatest extent possible. Waste management plans for construction, renovation or demolition projects are encouraged to help meet the State's reuse and recycling goals. Pursuant to section 22a-241a of the CGS, the state set a goal of 60% rate of diversion from disposal for municipal

solid waste by the year 2024 and adopted that goal in the state's December 2016 *Comprehensive Materials Management Strategy*. Part of this effort includes increasing the amount of construction and demolition materials recovered for reuse and recycling in Connecticut. DEEP recommends that contracts be awarded only to those companies who present a sufficiently detailed construction/demolition waste management plan for reuse/recycling. Additional information concerning construction and demolition material management and waste management plans can be found on-line at Construction and Demolition Material Management and Construction and Demolition Waste Management Plans. If there are any questions, please contact Frank Gagliardo at 860-424-3130 or Frank.P.Gagliardo@ct.gov.

Special Waste

If abatement is required for asbestos containing materials (ACM), these materials are regulated as a "special waste" in Connecticut and may not be disposed of with regular construction and demolition waste. Instead, these materials may only be disposed of at facilities that are specifically authorized to accept ACM. Although the disposal of asbestos-containing material is typically arranged for by the licensed asbestos abatement contractor, project proponents should ensure that the contractor disposes of all such materials at properly licensed facilities. For further information, contact the Waste Engineering & Enforcement Division at 860-424-3023. A fact sheet regarding disposal of special wastes and the authorization application form may be obtained at: Special Waste Fact Sheet.

Demolition debris may also include materials that contain polychlorinated biphenyls (PCBs). Such materials can include transformers, capacitors, fluorescent light ballast and other oil-containing equipment, and in certain building materials (i.e., paint, roofing, flooring, insulation, etc.). EPA has learned that caulk containing potentially harmful polychlorinated biphenyls (PCBs) was used around windows, door frames, masonry columns and other masonry building materials in many buildings starting in 1929 with increased popularity in the 1950s through the 1970s, including schools, large scale apartment complexes and public buildings. In general, these types of buildings built after 1978 do not contain PCBs in caulk. In 2009, EPA announced new guidance about managing PCBs in caulk and tools to help minimize possible exposure. The guidance can be found at: PCBs in Caulk. Where schools or other buildings were constructed or renovated prior to 1978, EPA and DEEP recommend that PCB-containing caulk removal be scheduled during planned renovations, repairs (when replacing windows, doors. roofs, ventilation, etc.) and demolition projects, whenever possible. However, the continued use of such PCB materials is prohibited and, where it is identified, it must be addressed. EPA recommends testing caulk that is going to be removed as the first step to determine what protections are needed during removal. Where testing confirms the presence of PCBs, it is critically important to ensure that they are not released to air during replacement or repair of caulk in affected buildings. Many such PCB removal projects will need to include sampling of the substrate and soil, as well as require plans to be approved by EPA in coordination with DEEP. Further information concerning the DEEP PCB Program can be found on-line at: DEEP PCB Program. Please contact Gary Trombly at 860-424-3486 with any questions.

Air Management

DEEP Bureau of Air Management 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 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 to allow them to enforce idling restrictions at the Project site without the involvement of DEEP.

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: Eric Hammerling