



Memo

To: Scott Bushee, Supervising Transportation Engineer

From: Frederick Riese, Sr. Environmental Analyst

Frederick Riese

CC: Peter Zaidel, DEEP Remediation Division

Date: 7/7/2022

Re: Safety Improvements for Route 82, Norwich

These scoping comments on the above-referenced project reflect review by the DEEP Natural Diversity Data Base (NDDDB) and the Remediation Division.

To address the simplest issue first, the project area is not located within any NDDDB review area.

The Remediation Division files within the project area were reviewed for any known or potential impacts to environmental media and potential impacts that could result from the proposed actions under this project. Our CEPA comments would ideally focus around 5 general themes for your consideration:

1. The resources of the proposed site of the project,
2. The environmental limitations of the site,
3. Any potential alternatives to the action proposed,
4. Any permits or approvals that may be necessary for the proposed action, and
5. Any appropriate measures that would mitigate the impact of the proposed action.

However, at such an early stage of the CEPA process, Remediation does not have enough information from the project description to offer considerations on items #1, 3, or 4, and likely would not be able to until more detailed engineering plans and more specific project plans (e.g., which 44 properties DOT anticipates impacting and which 5 properties DOT anticipates acquiring). We look forward to offering additional insights at such a later time as is helpful to DOT.

We can however speak to items #2 and 5 above, which are largely intertwined.

#2 – Limitations of the site

There were several properties located within the study area that were in a formal Remediation program– 401, 564, and 565 West Main Street. The entries are largely 20+ years old and suggest minimal known impact, though it appears that groundwater in the vicinity of 564 West Main Street (a gasoline station) was impacted with MTBE in the past. A note from 2005 suggested groundwater was impacted above the Groundwater Protection Criteria of 70 ug/L at the site. Given MTBE's discontinued use, it's likely the concentrations would have come down over time, but the possibility remains for impacted media to still be present. Little to no information could be found for 401 and 565 West Main Street.

Several spill reports were found on our public portal suggesting releases <10 gallons in volume of gasoline occurred at 406 West Main Street, at another gasoline station. The site is not in any known cleanup program, so the impact to environmental media at the site is unknown.

While the sites were never enrolled in a formal remediation program, there is also the possibility for soil and groundwater in the vicinity of 425 and 456 West Main Street to be impacted by chlorinated solvents due the presence of a dry cleaners (Westgate Dry Cleaners) who appear to have operated at the two facilities. Based on hazardous waste manifests and City of Norwich online information, it appears as though Westgate operated at 425 West Main Street until around 2008 or so, and then moved across the street to 456 West Main Street after that time. Hazardous waste manifests found on our public portal suggest that waste TCE and PCE were both generated at these sites and may have impacted environmental media in the vicinity of these two properties. However, as the sites were not in a formal cleanup program, we have no information about the condition of soil and groundwater in the vicinity of these two properties.

Fortunately, it appears as though public water runs through the project area and we could not identify any known private drinking water wells within the project area that could be impacted, which of course does not guarantee that there are none, but reduces the likelihood of drinking water wells that have been or could be impacted by project activities.

#5 – Mitigation measures

As mentioned above, we cannot offer much in the way of distinct mitigation measures until more detailed project specifics are known. In the meantime, the Remediation Division would suggest that the above potentially-impacted sites and associated environmental media (soil and groundwater) be carefully considered if DOT plans to acquire or impact any of these above-referenced properties as part of this project. DOT should be aware that there exists a potential for both petroleum-impacted soil and groundwater and/or chlorinated solvents-impacted soil and groundwater within the project area that could be exposed to site workers and the public as part of this project. However, the current environmental conditions within the project area are unknown due to a lack of recent data or a lack of any data for these sites.

DEEP appreciates the opportunity to review the scoping notice and to submit these comments. Please feel free to contact me ((860) 424-4110 or frederick.riese@ct.gov) should you have any questions.