

To: Paul Ferri, Division of Public Safety, Environmental Health and Safety
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From: Linda Brunza- Environmental Analyst

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Date: 3/27/2020

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Subject: Scoping Notice for the demolition of structures at University of Connecticut's Spring Manor Farm property located at 104 Spring Manor Lane.

The Department of Energy and Environmental Protection (DEEP) has received the Notice of Scoping for the project proposed by the University of Connecticut to demolish the following structures deemed in dilapidated condition: slaughter house, livestock barn, greenhouse, dairy processing house, dairy barn and two silos. The following comments were received from staff regarding this project:

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, or Kevin Barrett at 860-424-3697 or Kevin.Barrett@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 in order 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](#).

In addition to asbestos and PCBs, demolition debris may also be contaminated with lead-based paint, chemical residues, or other materials that require special disposal. For more information on these materials and disposal, see the [DEEP's Renovation and Demolition Web Page](#).

Deconstruction, an environmentally-friendly alternative to demolition, should be utilized in order to salvage as many of the reusable materials as possible, diverting them from the waste stream. Salvaged items typically include doors, windows, cabinets, lighting and plumbing fixtures, framing lumber, roofing materials, and flooring. Additional information concerning deconstruction can be found on-line at: [Deconstruction](#).

Response: All disposal of demolition wastes, including special wastes and regulated building materials, will should be handled in accordance with applicable solid waste statutes and regulations. In addition, materials have been identified for reuse. These materials are being carefully segregated and packaged for later use.

Aquifer Protection

The UConn Spring Manor Farm project is partially located in the UConn's Willimantic River Well Field Aquifer Protection Area. This area is mapped to a final Level A Aquifer Protection Area, has been formally adopted by the Town of Mansfield, and is regulated under the state Aquifer Protection Area Program. The proposed activity, demolition of structures, is not a regulated activity. However, other activities associated with this project are regulated activities, such as fueling of trucks on site and minor repair and maintenance of vehicles/trucks. These types of activities are prohibited in the aquifer protection area, and must be conducted outside the mapped aquifer protection area.

Best Management Practices (BMPs) are necessary for demolition in this area. These BMPs can be found online from the *Connecticut's Aquifer Protection Area Program Municipal Manual* entitled, *BMPs for Temporary Construction/Reconstruction in Aquifer Protection Areas*.

DEEP advises that the University of Connecticut create a map of the proposed work area with an overlay of the aquifer protection zone to inform all parties involved in this project of the importance of following best management practices.

Response: BMP's will be incorporated into the demolition processes. The structures have largely deteriorated into debris piles. Much of the work involves removing debris.

Stormwater

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 projects that are approved locally through the town (Locally Approved) and projects that are approved by the state (Locally Exempt). Registrants for Locally Exempt construction projects which will disturb over one acre must submit a registration form and Stormwater Pollution Control Plan (SWPCP) to DEEP. Registrants for Locally Approvable construction projects that have 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*. Registrants for Locally Approvable construction projects that have a total disturbed area of five or more acres must submit a registration form to DEEP prior to the initiation of construction. This registration shall include a certification by a Qualified Professional who designed the project and a certification by a Qualified Professional or regional Conservation District who reviewed the SWPCP and deemed it consistent with the requirements of the general permit. The SWPCP for Locally Approvable projects is not required to be submitted to DEEP unless requested. 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. Stormwater treatment systems must be designed to comply with the post-construction stormwater performance management requirements of the permit. These include post-construction performance standards requiring retention of the water quality volume and incorporating control measures for runoff reduction and low impact development practices. For further information, contact the Permitting and Enforcement Division at 860-424-3018. The construction stormwater general permit registrations can now be filed electronically through DEEP's e-Filing system known as ezFile. Additional information can be found on-line at: Construction Stormwater GP.

Response: Although total site disturbance is less than 1 acre, sedimentation and erosion controls will be established. Dost control will also be implemented and monitored.

Pest Management

Prior to demolition, a comprehensive survey of the project area should be conducted to identify rodent nesting/feeding areas. An extermination plan should be developed in coordination with municipal health officials to be implemented before demolition activities commence. After demolition, the project site and surrounding areas should be monitored to confirm the success of the extermination efforts and investigate any reports of rodents. Additional extermination efforts should be implemented, as necessaryd

Response: Pest management assessment has been incorporated as part of the pre-demolition planning.

Natural Diversity Database

The Natural Diversity Database (NDDDB) is a record of state or federal listed species maintained by the Wildlife Division that may be found in the project area. A cursory review shows that portions of this project may be within a Natural Diversity Database area. Please be advised that should state permits be required, a formal application may need to be sent to the Wildlife Division prior to submitting permit applications for a detailed review of the species that may occur in this area. Additional information concerning NDDDB reviews and the request form may be found on-line at NDDDB Requests.

Response: Project activities are less than an acre, consisting of mostly loading debris and rubble, with minor ground disturbance within the former structure footprint. Equipment traffic will use existing access used by UConn farming equipment.

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: Nicole Lugli, DEEP