



To: William Wallach, Department of Economic and Community Development
From: Linda Brunza, Environmental Analyst
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Date: 10/19/2023

Subject: Scoping Notice for Belding Mill Redevelopment Project, 107 Providence Street, Putnam

The Department of Energy and Environmental Protection (DEEP) has received the Notice of Scoping for grant funding by the Department of Economic and Community Development (DECD) for remediation and redevelopment of the Belding Masonry Mill Complex. The site is 1.85 acres at 107 Providence Street. When developed, the site will contain 120 mixed-income residential units. This project will utilize Municipal Brownfield Grant funds. DEEP supports DECD's efforts in promoting remediation and redevelopment of properties.

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 contact 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 a high-level 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: Darcy Winther, Supervising Analyst, Land and Water Resources Division, Regulatory Permitting East, 860-424-3063 or Darcy.Winther@ct.gov.

This project is located along the Quinebaug River. If work will be conducted along the river below the ordinary high-water elevation, it will likely need the [Federal 404 Clean Water Act, Water Quality Permit](#) issued by the Army Corps of Engineers, and the State 401 permit issued by DEEP. A fact sheet regarding 401 Water Quality Certification is available on-line at: [401 Certification](#). Pre-application meetings with the Land and Water Resources Division are available to discuss design and permitting information.

Being a remedial action, the project may qualify for the federal General Permit. If so, it may be waived from needing Connecticut's 401 permitting.

The applicant is advised to contact the [Army Corps of Engineers](#) first, to determine if the activities are in federally regulated areas and if so if the project qualifies under their General Permit.

The site is located within a FEMA 100-year floodplain. With state funding involved, flood management certification may be required. Flood management certification is administered by the Land and Water Resources Division for all state actions in or affecting floodplains. Any state agency proposing an activity, or sponsoring an activity, must apply for certification. More information can be found on DEEP's website at [Flood Management Certification](#), which includes a link to the required application documents.

Stormwater and Dewatering Wastewaters from Construction Activities General Permit

Contact: Bureau of Materials Management and Compliance Assurance, Permitting and Enforcement Division: 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. 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 the Department 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 the Department 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. Locally Approvable construction projects with a total disturbed area of five or more acres must submit a registration form and SWPCP to the Department at least 60 days prior to the initiation of construction. Registrations shall include a certification by the 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. 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. For further information, contact the division at 860-424-3025 or DEEP.StormwaterStaff@ct.gov. 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](#).

Natural Diversity Database

The Natural Diversity Database Review process was developed by DEEP to assist state agencies with the requirement that any activity authorized, funded, or performed by the state does not threaten the existence of endangered or threatened species. Applicants for state and local permits and grants may be required to consult with the NDDB as part of the application process.

Staff reviewed this location and found that it was not in a Natural Diversity Database Area and has no comments on the project.

Information/ Best Management Practices

Remediation Division

Contact: Veronica Tanguay, Analyst, Remediation Division. 860-424-3424, or Veronica.Tanguay@ct.gov

A review of the remediation site indicated that groundwater classification in this area is impaired and cannot be used for drinking water purposes. Public water is available in the immediate vicinity and surrounding area of the mill building. The mill is adjacent to the Quinebaug River which has a surface water classification of a "B" rating. This indicates the river is designated for habitat for fish and other aquatic life and wildlife, recreation, navigation, and industrial and agricultural water supplies. Based on the location of Belding Mill in relation to other remediation sites from 500-2000 ft away, and the availability of public water, it is expected that the impact to human health and the environment will be minimal, if any, during remediation activities.

Watersheds Program, Water Planning and Management

Contact: Emma Coffey, Analyst, Water Planning and Management Division. 860-424-3344 or Emma.Coffey@ct.gov.

The proposed remediation and redevelopment of the former Belding Masonry Mill Complex lies on the east bank of the Quinebaug River. This river is an impaired waterbody listed as not supporting aquatic life or recreation. As the redevelopment is located directly on the riverbank, all measures should be taken to prevent or mitigate impacts to the Quinebaug River as to not further impair this waterbody and downstream surface waters. Management measures for stormwater, sediment removal, and any activities related to the remediation should be taken as to not impact water resources.

There is an active hydropower generating facility with dam impoundment structures attached to this property, spanning the Quinebaug River, and an additional active hydropower generation facility just downstream. That facility is dependent on upstream river flow for proper operations and should be coordinated with as the project develops. The river has a diversion beneath the mill complex. Coordination with the Federal Energy Regulatory Commission should be documented in the post-scoping notice.

Solid Waste Disposal

Demolition waste that is not contaminated with asbestos, PCBs, or other materials that require special handling is subject to Connecticut's [solid waste statutes and regulations](#), and must be reused, recycled, or disposed of accordingly. 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. Connecticut's [Comprehensive Materials Management Strategy](#) outlines a goal of 60% recovery rate for municipal solid waste by the year 2024. Part of this effort includes increasing the amount of construction and demolition materials recovered for reuse and recycling in Connecticut. It is recommended 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 the DEEP's [C&D Material Management](#) and [C&D Waste Management Plan](#) web pages.

One way that certain types of construction and demolition waste can be reused is as clean fill. 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 Connecticut General Statutes and section 22a-209-2 of the RCSA. A fact sheet regarding disposal of special wastes and the authorization application form may be obtained at: [Special Waste Fact Sheet](#).

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](#).

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.

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