

STATE OF CONNECTICUT
DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION

ENVIRONMENTAL ASSESSMENT SUMMARY

Date: November 24, 2017

Municipality: City of Waterbury

Staff Contact: Ann Straut

Project Name: City of Waterbury Water Pollution Control Comprehensive Facility Evaluation

This assessment is being conducted in conformance with the generic Environmental Classification Document for Connecticut State Agencies to determine Connecticut Environmental Policy Act (CEPA) obligations.

Project Description: The Waterbury Water Pollution Control Facility (WPCF), owned by the City of Waterbury, is located at 210 Municipal Road in Waterbury, CT. The WPCF operates under National Pollutant Discharge Elimination System (NPDES) permit CT0100625 and is permitted for a design flow rate of 27.05MGD and discharges effluent to the Naugatuck River. The current permit includes a compliance schedule for the reduction of phosphorous in the effluent to meet Connecticut's phosphorous permitting approach. This project will bring the effluent into compliance through the use of chemical addition and filters.

Regulations of Connecticut State Agencies (RCSA) Section 22a-1a-3 Determination of Environmental Significance (Direct/Indirect):

1. Impact on air and water quality or on ambient noise levels

a. Air Quality – The entire State of Connecticut, including the project area, is currently in non-attainment for 8-hour ozone. The project area, along with the rest of the State of Connecticut is in attainment for all other criteria air pollutants: particulate matter (<10 micrometers in diameter-PM₁₀ or < 2.5 micrometers in diameter-PM_{2.5}); sulfur dioxide (SO₂); ozone (O₃); nitrogen dioxide (NO₂); carbon monoxide (CO); and lead (Pb). No new sources of stationary source air pollutant emissions should occur as a result of the project. Traffic should not increase as a result of the project, and therefore, there will be no increase in mobile source emissions of air pollutants.

Construction of a new building and upgrades to existing facilities will involve temporary emissions from construction equipment. Potential construction air quality impacts can occur due to the use of diesel-powered construction vehicles. Diesel air emissions include carbon monoxide, hydrocarbons, nitrogen oxides, and particulate matter. Emissions from construction equipment are anticipated to be significantly less than the total emissions from other industrial and transportation sources in the region, and therefore, are expected to be insignificant with respect to compliance with the National Ambient Air Quality Standards. Potential localized air quality impacts would be avoided or limited by proper operation and maintenance of construction equipment and adherence to State regulations limiting idling of engines.

Construction activities may involve dust emissions that will be contained via construction best management practices that may include: covering material stockpiles; limiting dust producing construction activities during high winds; and application of water or calcium chloride to control dust as required. Any project-related emissions will not interfere with

the air quality goals for the State Implementation Plan. No negative impacts are anticipated.

- b. *Water Quality* – The WPCF discharges to the Naugatuck River. Improvements to the WPCF will improve the water quality of the Naugatuck River by reducing Phosphorus loading in plant effluent. Any construction at the facility will take place within the existing fence line. All construction activities will include construction best management practices to protect the water supply. No negative impacts are anticipated, and a long-term benefit to water quality is anticipated from the WPCF improvements.
- c. *Ambient Noise Levels* – Use of heavy construction equipment during construction activities are a potential source of short-term noise impacts. Construction activity will occur during daytime hours and any adverse noise impacts due to construction activities will be temporary. In addition, construction noise is exempt from the state noise standards found at RCSA 22a-69-1 through 22a-69-7.4. No negative impacts are anticipated.

2. *Impact on a public water supply system or serious effects on groundwater, flooding, erosion, or sedimentation*

- a. *Water Supply* – The project is not within a public water supply source area, therefore, no negative impacts are anticipated (see letter from Connecticut Department of Public Health stating no comment, attached).
- b. *Groundwater* – No significant negative impacts are anticipated. Construction Best Management Practices will be followed during construction to prevent any groundwater impacts.
- c. *Flooding* – The proposed project property boundaries include area located in flood zones AE (100-year flood) and Zone X (500-year flood). The majority of the work will take place outside the flood plain, however, the lower clarifier pump station and associated piping will be partially located with Zone X. Any impacts on the flood plain will be properly evaluated and remediated during final design. A flood management certificate will be applied for and all recommendations incorporated into the final construction plans. No negative impacts are anticipated.
- d. *Coastal Zone* – The project is not located within a Coastal Boundary and therefore will have no impact on Coastal Resources.
- e. *Aquifer Protection* – The site is not located within an Aquifer Protection District.
- f. *Inland Wetlands* – There are wetlands adjacent to the project, however, there are no anticipated direct or indirect impacts to wetlands identified by the National Fish and Wildlife National Wetlands Inventory. Any work performed within 100-feet of any wetland or watercourse will require an Inland Wetlands Permit and all recommendations in the permit will be included as part of the project final design. Requirements for Construction Best Management Practices including hay bales, silt fences will be included as part of final design to comply with *Connecticut Guidelines for Erosion and Sedimentation Control*.

3. *Effect on natural land resources and formations, including coastal and inland wetlands, and the maintenance of in-stream flows* – The project is located inland and will not affect any wetlands or stream flows. All work will take place in previously disturbed areas.

4. *Disruption or alteration of an historic, archeological, cultural, or recreational building, object, district, site, or its surroundings* – The project location is within a previously disturbed site, therefore no negative impact to historical or archaeological resources will occur as a result of the project.
5. *Effect on natural communities and upon critical species of animal or plant and their habitats; interference with the movement of any resident or migratory fish or wildlife species* – The project location does not have any State or Federal Listed Species or Significant Communities shown on the CT DEEP maintained Natural Diversity Database Map.
6. *Use of pesticides, toxic or hazardous materials or any other substance in such quantities as to create extensive detrimental environmental impact* – The project includes chemical feed for phosphorous removal and pH adjustment however, all chemicals will be stored and maintained in a manner so as to contain any spills and a Spill Prevention and Countermeasure Plan will be updated for any new chemicals used on site as part of the final phosphorous removal process. Measures will be taken during the construction process to avoid spills of fuel or other potentially hazardous materials during equipment operation. No negative impact is expected.
7. *Substantial aesthetic or visual effects* – The project is not expected to cause a negative impact as the project is at the site of an existing Water Pollution Control Facility in an industrial area of town.
8. *Consistency with the written and/or mapped policies of the Statewide Plan of Conservation and Development and such other plans and policies developed or coordinated by the Office of Policy and Management or other agency* – Based on areas identified on the Interactive Location Guide Map for the 2013-2018 State Conservation and Development Policies Plan, the project is located within a Priority Funding Area and borders on a Balanced Priority Funding Area. Also, the draft *Adopted Plan of Conservation and Development 2015-2025* shows the area as “infrastructure”. The project is consistent with the policies of the 2013-2018 State Conservation and Development Policies Plan and the draft *Adopted Plan of Conservation and Development 2015-2025*. No negative impact is expected.
9. *Disruption or division of an established community or inconsistency with adopted municipal and regional plans* – The City of Waterbury’s *Adopted Plan of Conservation and Development 2015-2025* shows the project area as an enterprise zone. In addition, the 2008 Central Naugatuck Valley Regional Plan of Conservation and Development shows that the area is part of the regional core in an economic development area and in a proposed or open space area. The project is entirely within the existing Water Pollution Control Facility fence line and will not disrupt or divide the community and is consistent with the adopted municipal and regional plans. No negative impact is expected.
10. *Displacement or addition of substantial numbers of people* – This project does not involve the displacement of people or result in a population increase in the project area; no negative impact is expected.
11. *Substantial increase in the congestion (traffic, recreational, other)* – This project may increase truck traffic for a brief time during construction, however, truck traffic should be the same or reduced at the completion of construction. No negative impact is expected.
12. *A substantial increase in the type or rate of energy use as a direct or indirect result of this action* – There will be very little increase in energy use, if any, due to utilization of new, energy efficient equipment (e.g. pumps). No significant impact is expected.

13. *The creation of a hazard to human health or safety* – All work will remain within the existing treatment plant footprint. No negative impact is expected.
14. *Any other substantial impact on natural, cultural, recreational or scenic resources* – No negative impact is expected.

The Following Comments Were Received During the Scoping Process:

1. *DPH letter stating they had no comments.*

Conclusion:

Based on the DEEP's environmental assessment of this project, it has been determined that the project does not require the preparation of an Environmental Impact Evaluation (EIE) under CEPA.

Recommendations:

Prior to starting the project construction, the following best management practices should be considered:

1. Construction Maintenance: No construction should take place before erosion and sedimentation controls are installed. These controls should be properly installed, maintained, inspected regularly, and remain in place until the project construction is completed. During construction and until a vegetative cover is reestablished, the project area should be inspected daily and after rainfall to verify erosion control measures are properly functioning. Any defects on the structure must be immediately repaired.
2. Emergency Response Plan: Develop an Emergency Spill Response Plan before construction begins. Spill response equipment should be available on-site at all times along with personnel trained in the proper use of such equipment.
3. Hazardous Materials Storage: Hazardous materials should be removed from the site during non-work hours or otherwise stored in a secure area to prevent vandalism. Place covered trashcans and recycling receptacles around the site. Cover and maintain dumpsters. Check frequently for leaks. Place dumpsters under a roof or cover with tarps or plastic sheeting. Never clean a dumpster by hosing it down on site.
4. Vehicles and Machinery: Methods and locations of refueling, servicing, and storage of vehicles and machinery should be addressed and included as notes on the final site plans. All equipment fueling or minor repairs should occur on a fueling pad. Onsite fuel storage for heavy equipment should have containment and be located in a secure area where it will not be vandalized or struck by equipment or vehicles on the job site.