



November 29, 2022

Thomas H. Fenton, P.E.
Town of Hebron Engineer
c/o Nathan L. Jacobson & Associates
86 Main Street
Chester, Connecticut 06412

Sent via email: tfenton@nlja.com

Re: Hebron's Proposed Public Works Facility

Dear Mr. Fenton,

I am responding to your September 27, 2022 inquiry for the perspective of Department of Energy and Environmental Protection (DEEP) regarding the proposed siting of a new Public Works facility with salt storage on a parcel between Main Street and Kinney Road. While it is not customary for DEEP to weigh in on potential siting deliberations, I understand that DEEP's perspective has been represented by others in recent public informational meetings on this topic. In particular, the Town has solicited DEEP's perspective on the storage of salt at the proposed Public Works facility.

The Water Permitting and Enforcement Division of DEEP has experience with and regulatory oversight of salt storage through DEEP's General Permit for the Discharge of Stormwater Associated with Industrial Activity. The municipality should be aware that this general permit prohibits the location of new road salt or deicing materials storage facilities within 250 feet of a potable drinking water supply well. In addition, the general permit contains design requirements and requires the implementation of best management practices (BMPs) to minimize the exposure of materials and pollutants to stormwater, which can have the potential to impact surface water and groundwater quality. Such requirements and BMPs include, but are not limited to, the following:

- The storage facility must be a roofed structure with impervious liner that will not allow for release of material through the sidewalls.
- Liquid deicing materials must be stored within a double-walled tank or container or within impermeable secondary containment area as described in the industrial stormwater general permit. Stand-alone tanks/containers must also be protected from possible collisions.
- Vehicle and equipment rinse and wash waters must be collected and hauled away or discharged via oil/water separator to the sanitary sewer as authorized under the Miscellaneous Industrial User General Permit.
- Any mixing of salt products must take place under a covered structure.
- Routine housekeeping to sweep up spilled salt from loading/unloading areas must be performed.
- Uncontaminated stormwater runoff should be diverted around areas, such as salt storage, that may contribute pollutants to the runoff.

The purpose of these BMPs is to prevent unacceptable levels of pollution to surface water and groundwater and comply with Connecticut's Water Quality Standards, which standards are required by Section 303(c) of the federal Clean Water Act. With any source of salt there is potential for contaminating the surface water and groundwater resources, but with proper site design and the consistent employment of permit-required BMPs, DEEP believes that this risk can be minimized.

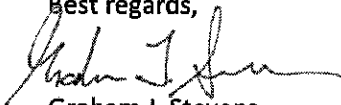
Should this facility be constructed, regardless of the Town's adherence with the permit-required BMPs, the Town will remain responsible for addressing any unacceptable water quality impacts, including impacts to private drinking water quality, caused by its storage and/or use of salt.

DEEP's Remediation Division has experience with salt impacts to groundwater used for drinking purposes. The focus of the Remediation Division is to investigate and remediate pollution to soil, groundwater and surface water that is caused by human activities. Salt impacts to drinking water can occur where salt is stored and loaded into snowplows, especially if permit-required BMPs are not followed. Salt application to the road surface, can also impact surface water or groundwater quality. To further minimize unacceptable impacts to drinking water or other water resources, the Remediation Division recommends all municipal Public Works staff participate in the UConn T2 Center's Green Snow Pro training (https://stage.cti.uconn.edu/cti/Sustainable_Winter_Operations_Resources.asp). This training teaches best practices for salt application, equipment calibration, and vehicle and equipment maintenance to minimize salt impacts to the environment. Application of salt to the roadway poses a higher risk to water resources than its proper storage and on-site management.

Town-stored and applied salt is not the only source of salt impact to drinking water. Salt is applied to walkways, driveways, and parking lots and it can be present in water softener discharge. Therefore, if the Town moves forward with constructing a new salt storage facility here or elsewhere, it may be prudent to determine the baseline groundwater quality surrounding the facility. Additionally, if homeowners have concerns about their drinking water, it is recommended that they test their water annually for "basic indicators" including sodium and chloride. More information can be found on the Department of Public Health's webpage <https://testyourwell.ct.gov/>.

Regardless of the outcome of this matter, DEEP strongly suggests that Towns are thoughtful about all land-use decisions that have the potential to impact our water resources.

Best regards,



Graham J. Stevens

Bureau Chief

Water Protection & Land Reuse

cc: Andrew J Tierney, Town Manager
Raymond Frigon, DEEP Remediation Division
Karen Allen, DEEP Stormwater Unit