



CT ACHMM NEWSLETTER

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CT ACHMM President's Message

Matthew J. Twerdy

Greetings everyone! I trust the past year has brought you an abundance of inspiration, knowledge and achievement.

Currently we are holding our 2010 CTACHMM Board of Directors Election. (You can vote online on our website, Board of Directors page.) We have been fortunate to have several members serve in leadership positions beyond their specified tenure. However, we believe that it is important to have new individuals continue to volunteer to add new energy and ideas to our active chapter. As such, if members are interested in being identified for any elected positions or appointed positions, please contact John Murray, our Membership Chairman, at John.Murray@baystatehealth.org. The Institute of Hazardous Materials Management (IHMM) recognizes service as a chapter officer as being eligible for 20 certification maintenance points per year.

Also, the Alliance of Hazardous Materials Professionals (AHMP) 2010 National Conference was an excellent experience again this year. The AHMP National Conference is the EHS&S, hazardous materials and waste management industry's essential forum for national and international information exchange and networking. It was held in Atlanta from September 12-15, 2010. I highly recommend attending one of these conferences. It brings you together with other professionals from across wide-ranging disciplines – both domestic and international – to give you new perspectives while leading our industry into the future.

As we embark into a New Year, I hope each of you take the opportunity during the holiday season to relax and spend time with friends and family. I extend my best wishes to each and every one of you for a peaceful and joyous holiday season and a happy, healthy and prosperous 2011.

Matt Twerdy

CT DEP Industrial Stormwater General Permit Update

Paul Simonetta, CHMM
Vice President
Triton Environmental, Inc.

The DEP has been working over the last several years to develop a new, substantially modified General Permit for the Discharge of Stormwater Associated with Industrial Activity. The new permit has been finalized and will go into effect on October 1, 2011. The current General Permit will be extended for one more year to allow companies time to complete the work necessary to comply with the new permit.

Timeline

Companies with subject sites will need to develop, modify, and recertify Stormwater Pollution Prevention Plans (SWP3) prior to re-registering (more details below). In addition, companies will need to prepare to comply with the new requirements in the permit, including modified inspection and monitoring requirements. Forms and fees to re-register (increased to \$1,000.00 per facility) need to be submitted based on the following schedule.

July 1, 2011 – Registration deadline for sites that do not make SWP3 plans available electronically to the public.

August 1, 2011 - Registration deadline for sites that make SWP3 plans available electronically to the public (via website).

To prepare for the new permit requirements and the development of SWP3, companies are advised to consider planning for these changes at the end of 2010 or the beginning of 2011.

MSGP Requirements

The most fundamental change to the current Industrial Stormwater General Permit is the incorporation of elements from the federal Multi-

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F Lot, Fly-Ash Landfill Closure, Remedial Action Implementation

Jim Pietrzak, P.E. CHMM,
University of Connecticut, Architectural and
Engineering Services

Under CTDEP Consent Order Number SRD 101 the University of Connecticut continues to pursue the implementation of an Environmental Land Use Restriction (ELUR) that will be placed on the F Lot Fly Ash Landfill to preclude the future residential use of the property. A cover was installed over the approximately 6.4-acre disposal area in 1999.

Background: The F Lot Fly Ash Landfill was originally constructed in the late 1960s as a student parking lot. Storm water from a parking area located to the west of the Architectural & Engineering Services Building (AES) was collected by three catch basins and discharged to a swale north of the F Lot perimeter via an 15-inch diameter pipe (area was constructed in the 1996-1997 time frame).

Disposal History and Chronology:

- 1950s-late 1960s – ash from two (2) incinerators and “unburnables” disposed of in F Lot.
- 1970 – Parking lot constructed over fill area.
- 1997-1998 – Geotechnical explorations encountered solid waste and ash mixed in with granular fill.
- 1997-1998 - Investigations conclude that contaminants consistent with disposal history detected in fill materials (principally metals, with some polycyclic aromatic hydrocarbons).
- 1999 Interim cap and parking areas constructed.

Discovery of Ash Fill: In 1998 during preliminary exploration work for a new Central Warehouse facility, ash fill mixed with refuse was encountered in the F Lot. As part of the remedial actions to be undertaken, F Lot was closed as an unpermitted solid waste facility in a manner consistent with CTDEP solid waste regulations. Haley & Aldrich, Inc. provided the closure design and had personnel observe and grade electrical system installation and installation of documented final cover closure procedures, as well as conducting field and laboratory QA/QC monitoring.

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Previous Remedial Work: Previous work at F Lot included pavement removal, filling and compacting to geotextile and 40-mil liner materials, drainage modifications, three inches of asphalt paving on top, and stone side-slopes. The parking lot area was modified during F Lot Closure work completed in 1999, with discharge from the area now collected by one catch basin located west of the AES building near the southwestern corner of the Incinerator Building. A cover was installed over the approximately 6.4-acre disposal area.

Cover Design: The cover was designed in accordance with the Regulations of Connecticut State Agencies (RCSA) Section 22a-209. Pavement was restored over an additional 1.4 acres. The total area of closure-related construction is approximately 7.8 acres. The cover consists of 40-mil thick Very Flexible Polyethylene (VFPE) membrane overlying at least six (6)-inches of compacted granular fill. Smooth membrane was used in relatively level areas, and textured membrane was used on slopes. Non-woven polypropylene geotextile was placed above the membrane to provide a cushion for protection from overlying materials. Fill materials placed above the geotextile cushion varied from top to bottom depending on the finished surface condition.

F Lot Remediation Implementation Conclusions:

- Operation, maintenance and monitoring of the cap will be performed to ensure the cap prevents infiltration and controls gas migration
- A variance was submitted for use of an engineered control (the cap) of contaminated soils
- An Environmental Land Use Restriction (ELUR) will be placed to preclude the future residential use of the property
- Groundwater flow across F Lot is to the south/southwest toward Eagleville Brook and its tributaries.
- Fill contains refuse and ash, but majority of fill is unsaturated.
- Groundwater in F Lot does not have landfill leachate signature.
- There are up-gradient sources of volatiles (Motor Pool).
- Data where metals exceeded RSRs was attributed to sample turbidity.

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Sector General Permit (MSGP). Most notably, nine designated industries now have additional “sector-specific” requirements. While all regulated facilities will be subject to the main sections of the general permit, industries in these designated sectors will have additional requirements. Examples include monitoring for and compliance with additional discharge parameters, increased control measures, and additional Stormwater Pollution Prevention Plan (SWP3) requirements.

As noted above, the updated permit has been substantially modified. The following is a brief summary of several of the new or modified requirements of the main sections of the permit.

Stormwater monitoring

Visual monitoring of stormwater samples will be required quarterly for the duration of the permit. Samples will need to be inspected for a number of parameters (color, odor, clarity, floating solids, etc.). However, physical testing of the samples (lab analysis) will not be required during these inspections. If the results from visual monitoring indicate that the established control measures are not effective, the facility will need to consider modifying those measures.

General monitoring involving laboratory testing will be required semi-annually (twice per year) for the standard parameters (oil & grease, metals, total suspended solids, etc.) for the first two years of the permit. If the result from averaging the four events for a parameter is below the established benchmark levels, no further monitoring will be required for the duration of the permit. Semi-annual monitoring, however, would continue to be required for any parameter with an average above the benchmark until the average of four consecutive semi-annual monitoring events is below the benchmark.

Discharges of stormwater to impaired waters (as defined by the DEP) that do not have an

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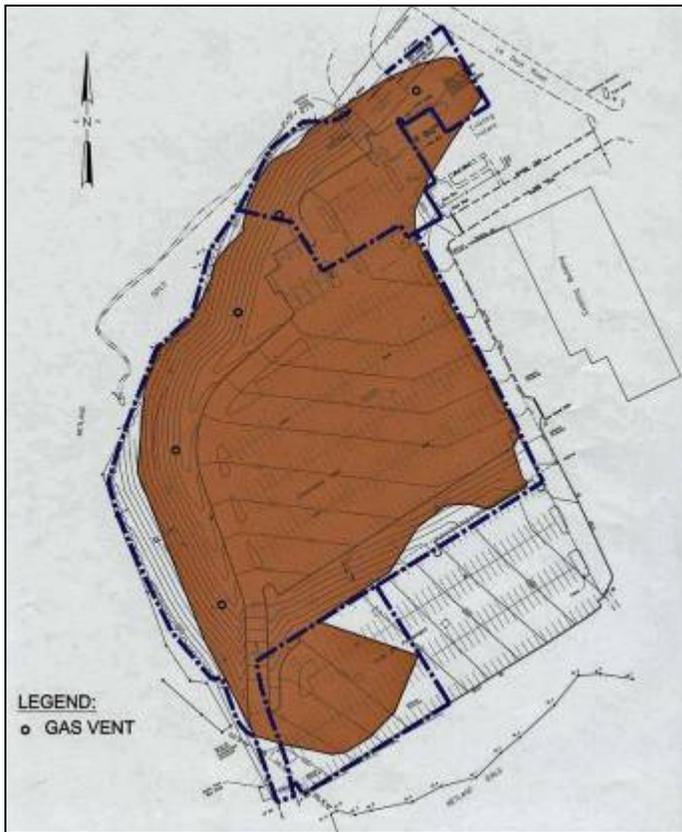
....Fly Ash Closure from page 3

- Background arsenic concentrations exceed Connecticut's Remediation Standard Regulations (RSRs).
- F Lot does not appear to be a source of groundwater, soil gas, or surface water contamination. An exposure pathway to the fill materials at F Lot does not exist, because an Interim cap is in place. Contaminants detected in groundwater, surface water and sediment near F Lot are attributed to runoff from roadways and parking lots or migration of contaminated groundwater from the existing Motor Pool area.



Aerial View - F Lot Parking Area (foreground) – Looking North toward

C Lot (Landfill Closure)



Liner Location at F Lot

Upcoming CTACHMM Event

**REGULATORY UPDATE PRESENTATION AT
FUSS & O'NEILL**

DECEMBER 9, 2010, 4:30 PM

FUSS & O'NEILL

146 HARTFORD ROAD

MANCHESTER, CT

GUEST SPEAKER: CHRIS ECSEDY

**CHRIS IS THE VICE PRESIDENT/PROJECT
DIRECTOR OF THE FUSS & O'NEILL FACILITIES
AND ENVIRONMENTAL SERVICES BUSINESS
UNIT**

**THE PRESENTATION WILL BE FOLLOWED BY
6:00 SOCIAL AND 6:30 DINNER AT:**

CARRABBA'S RESTAURANT

31 RED STONE ROAD

MANCHESTER, CT

YOU TOO CAN GET PUBLISHED IN THIS NEWSLETTER....

WRITE ABOUT A TRIP OR SPECIAL EVENT YOU ATTENDED

INTERVIEW A COLLEAGUE

CRITIQUE A PRODUCT

NEXT NEWSLETTER SUBMISSION DEADLINE FOR 2011 MARCH ISSUE: FEBRUARY 20

SEND NEWSLETTER SUBMISSIONS TO ELSA PAYNE AT tpayne@snet.net

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established Total Maximum Daily Load (TMDL) may need to monitor for indicator pollutants identified as contributing to the impairment. For discharges to impaired waters with a TMDL, monitoring will not be required for indicator pollutants unless specifically requested by the DEP.

Inspection requirements – In addition to the semi-annual inspections as currently required, inspections will also be required monthly. The inspections need to be completed by individuals identified in the SWP3 as “qualified personnel”. Written follow-up procedures are required to respond to any findings from the monthly inspections.

SWP3 Requirements

As noted above, modifications will be required in the SWP3s. Some of the required updates to the plans are presented below.

- At least one member of the SWP3 team is required to be present at the facility or on-call during all operational shifts;
- Site maps require additional details including the following: locations of buildings and structures; site size and impervious coverage; location of all stormwater conveyances including catch basins, ditches, pipes, etc.; extent of wetlands; receiving surface water bodies (including whether a TMDL has been established); and discharges to groundwater through infiltration systems.
- Additional requirements have been established for secondary containment (110% rather than 100%) for new tanks installed in an exterior area that has the potential for exposure to stormwater.

- The SWP3 will require an updated description of monitoring programs based on changes in the permit (see above).
- General and individual permits issued for the site will need to be included in the SWP3.

Public Availability of Registered Sites and SWP3

The DEP will be making a list of sites that are registered for the General Permit publicly available each month. They will also provide copies of the registration applications and no-exposure certifications to the public upon request. In addition, the DEP is requiring that SWP3s be made publicly available, either electronically online or upon request by the public. Upon receipt of the SWP3, the public may provide comments to the DEP within 30 days.

Upcoming CTACHMM News

Currently we are holding our 2010 CTACHMM Board of Directors Election for the following positions:

- Vice-President/President-Elect (three years total, one as VP, one year as president, one year as Immediate Past President)
- Treasurer (two-year term)

Positions that are open and appointed (Elected by the Board of Directors) are:

- Government Affairs Chairperson
- Trustee