



STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

December 21, 2009

Ms. Colleen Kissane – Transportation Assistant Planning Director
State of Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06106

RE: Notice of Scoping for Greater Bridgeport transit Maintenance/Operations Facility,
Bridgeport, CT

Dear Ms. Kissane:

A review of the notice of scoping documents reveals limited information at this stage of the project. However, it does mention construction of a building. If a building is to be constructed, it should be built using radon resistant features. renovated, or remodeled, and soil excavation is undertaken, then it should be built using radon resistant features. Should the project include any demolition of existing buildings, remodeling, renovation, or excavation of soils, then a plan must be in place to address lead contaminated soils, lead-based paint, and asbestos since these materials may be encountered during demolition or excavating activities. This type of construction activity could result in the disturbance of surfaces that may contain asbestos, lead-based paint and/or lead contaminated soils.

The following summarizes the Department's position with regard to lead, asbestos, and radon:

A. Lead-Based Paint:

It does not appear that excavation or construction activities that may be associated with this project are subject to the Department of Public Health (DPH), Childhood Lead Poisoning Prevention and Control Regulations (§§19a-111-1 through 19a-111-11). However, there are other issues that must be addressed related to lead-based paint. Among these issues are the following:

- Testing of paint on existing structures marked for demolition or testing for lead in soils should be performed by a lead inspector or lead inspector/risk assessor certified by the DPH.
- Planned demolition or soil removal activities should be performed using lead-safe work practices.
- If lead-based paint or lead contaminated soil is identified, the classification and disposal of generated waste must comply with the Resource Conservation Recovery Act (RCRA) and Connecticut Department of Environmental Protection standards (e. g., Toxicity



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Characteristics Leaching Procedure [TCLP] testing, reporting, and record keeping requirements).

- Additionally, if lead-based paint, lead containing paint, or lead contaminated soil is identified, workers must be trained (as a minimum) according to the Occupational Safety and Health Administration (OSHA) lead standards (29 CFR 1926.62).
- Because other contaminants may also be present on the site, additional health and safety training may be required (e. g., hazardous waste and/or asbestos).

Additional inquires on the subject of lead-based paint can be directed to Francesca Provenzano Health Program Supervisor of the Lead Poisoning Prevention and Control Program at (860) 509-7299.

B. Asbestos Program:

The asbestos inspection must be conducted by an Inspector or a Management Planner licensed by the DPH. Asbestos abatement that involves more than three (3) linear feet or more than three (3) square feet of asbestos-containing material must be performed by an asbestos abatement contractor licensed by the DPH. Additionally, the DPH must be provided with notification prior to asbestos abatement that involves greater than 10 linear feet or greater than 25 square feet. Asbestos abatement must be performed in accordance with all applicable federal, state and local regulations.

Additional inquiries on the subject of asbestos abatement can be directed to Ronald Skomro, Supervising Environmental Analyst of the Asbestos Program at 860-509-7367.

C. Radon

The United States Environmental Protection Agency (EPA) developed a radon potential map using data from studies and surveys conducted in Connecticut. The map assigns each of the counties in Connecticut one of three zones based on radon potential. The radon zone designation of the highest potential is Zone 1, the moderate potential is Zone 2, and the low potential is Zone 3. The proposed site is located in a high potential, Zone 1 area. Therefore, measures should be taken to help control radon and its harmful effects. The Connecticut Department of Public Health Radon program recommends that during the construction of the building, radon resistant features should be built into the infrastructure of the building.

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The list below describes the basic components of radon resistant new construction:

- A gas permeable layer, such as 4-inch gravel, placed beneath the slab to allow soil gases to move freely underneath the building
- Plastic sheeting over the gas permeable layer and under the slab to help prevent soil gases from entering the home
- Sealing and caulking all openings in the foundation floor to reduce soil gas entry
- A vent pipe, such as 6 inch PVC pipe, to run from the gas permeable layer through the building to the roof to safely vent soil gases above the building
- An electrical junction box installed in case an electric venting fan is needed later

The facility should be tested for radon after construction is completed. If radon results are at or above 4.0 picocuries per liter (pCi/L), the existing system should be activated by installing an in-line fan. For a list of qualified radon mitigation contractors to assist with the system activation, please refer to the following website:

www.dph.state.ct.us/BRS/Radon/radon_program.htm

Additional inquiries on the subject of radon-resistant new construction can be directed to Francesca Provenzano, Health Program Supervisor of the Radon Program at 860-509-7367.

Sincerely,



Suzanne Blancaflor, M.S., Chief
Environmental Health Section

C: J. Smith, Office of Policy Management