Pre-Disaster Planning

Municipal officials are encouraged to pre-designate sites to allow post-storm clean-up efforts to begin early and in an efficient manner.

- Pre-designated sites should preferably be on public property and generally consist of 10 acres or more, depending on anticipated needs. However, smaller sites may be appropriate based on the type of waste being managed and space constraints. The required size of the site will depend on the expected volume of debris to be collected and planned volume reduction methods. As a general rule, larger sites mean fewer sites and, hence, easier site closeout. However, larger sites may create logistical problems.

- Consider the temporary staging locations with respect to noise, traffic, and the environment.

- Use public lands first to avoid costly leases. Use private land only if public sites are unavailable. If private lands are utilized for municipal debris management operations, they must have government (or its designated contractor) oversight and management.

- When selecting public (or private sites), consider the pre-existing conditions to which the property must be restored upon site closeout. Have attorneys review leases for private land to avoid extensive damage claims upon site closeout.

- Environmentally sensitive areas such as wetlands, critical habitats, drinking water well fields and surface waters and historic/archeological sites should be avoided. However, if use of such areas is unavoidable, notify the Department so that applicable emergency authorizations can be considered.

- Consider site location and impacts from noise, dust, and traffic which are tolerated early in disaster recovery, but which may have to be curtailed later. If possible, avoid locating near residential areas, schools, and hospitals.

- Look for sites with good ingress/egress to accommodate heavy truck traffic and that have a site configuration that will allow for an efficient layout.

The following questions will help to identify and prioritize appropriate sites based on local requirements and conditions:

- **Potential Site Ownership**
  - Are public lands available?
  - Are private land lease terms long enough?
- Are private land lease terms automatically renewable?
- Does the private land lease include a landscape restoration agreement?

**Potential Site Size**
- Is the site large enough to accommodate the planned debris storage and/or reduction methods?
- Will the site configuration allow for an efficient layout?

**Potential Site Location**
- **Things to avoid:**
  - Wetlands. If near wetlands, establish buffer and/or turbidity barriers.
  - Public water supplies; well fields or surface waters
  - Threatened and endangered species.
  - Critical habitat
  - Rare ecosystems
  - Historic sites
  - Archaeological sites
  - Sensitive surrounding land uses – schools, nursing homes, hospitals, residential, etc.
  - Consider prevailing winds for dust and odors.

- **Things to look for:**
  - Good ingress/egress
  - Good transportation arteries nearby
  - Open flat topography

**Site Selection / Baseline Data Checklist**
- Lined temporary storage areas should be established for household hazardous waste, fuels, and other materials that may contaminate soils and groundwater. Plastic liners should be placed under stationary equipment such as generators and fuel tanks. These actions should be included as requirements in any contract specification or scope of work. If the site is also an equipment storage or operation area, provide secondary containment for storage areas when possible and monitor fueling and equipment repair to prevent and mitigate spills of petroleum products and hydraulic fluids.

- Be aware and lessen the effects of operations that might irritate occupants of neighboring areas. Establishment of a buffer zone can abate concerns over dust, noise, and traffic.

- Before activities begin:
  - [ ] Photograph and/or video the site
  - [ ] Notation of important features – structures, fences, culverts, landscaping, etc.
  - [ ] Random soil sampling [only if Debris Management Site (DMS) is used for other than green waste – trees, limbs, brush]
  - [ ] Field screening of soil for volatile organic compounds
  - [ ] Water samples from existing monitoring wells and on-site and abutting water supply wells within 500 feet (only if DMS is used for other than green waste – trees, limbs, brush)

- After activities begin:
  - [ ] Progressive updates including photographs and/or video.
Periodically map/sketch site layout including “hot” areas – these are areas where materials other than green waste is being or has been stored during the cleanup after the event or where a spill or release has occurred.

Integrate quality assurance reports. Include documentation of contractor fuel spills, leaks, etc. and response to such incidents

Sample groundwater monitoring wells and/or supply wells if area used for extended time period (only if DMS is used for other than green waste – trees, limbs, brush)

► Site Permitting Processes

When responding to a storm event, it is expected that the municipality would contact the Connecticut Department of Energy and Environmental Protection (CT DEEP) and request that an Emergency Authorization be issued for use of their chosen site(s).

► Site Closure Checklist

Once a site is no longer needed, it should be closed in accordance with the following guidelines. Closeout or re-approval of a DMS should be accomplished within 30 days of receiving the last load of debris. Closeout is not considered complete until the following occurs:

● Material Removal
  ▪ All processed and unprocessed green waste shall be removed to a facility permitted to take clean wood waste.
  ▪ All other construction and demolition debris or other wastes shall be removed to a permitted facility authorized to accept such wastes, for example a recycling facility, volume reduction facility, and/or landfill.

● DMS Site Assessment and Potential Remediation
  ▪ During the debris removal process and after the material has been removed from each of the DMS sites, environmental assessment will be needed to close each of the sites. This is to ensure that no long-term environmental contamination is left on the site. The monitoring should be done on two different media: soil, and groundwater.
    o Soil. Monitoring of the soils should be by portable inspection methods to determine if any of the soils are contaminated by volatile hydrocarbons, particularly if it is determined that hazardous material, such as oil or diesel fuel, was spilled on the site. This phase of the monitoring should be done after the stockpiles are removed from the site.
    o Groundwater. The monitoring of the groundwater should be done to determine the probable effects of rainfall leaching through the stockpile areas. Constituents sampled should reflect contaminants reasonable expected to be present based on the types of materials stored. This monitoring should be conducted after all debris has been removed from the DMS(s).

  ▪ The generic checklist below is for quality assurance when determining adequacy of closure. If the municipality is using a contractor to manage the DMS, then this will help determine adequacy of closure prior to final payment, assuming the contractor will haul debris from the site and be responsible for site closure.

  ▪ During closure phase develop or ensure contractor develops site-specific remediation for DMS(s), as needed, based on information obtained from the closure checklist shown below.

    □ If private property, have all site-specific conditions been met?
☐ Have disturbed or filled wetlands been restored to the satisfaction of the municipality and their location marked on plans?
☐ Have the location(s) of storage area(s) been marked on plans?
☐ Have debris stockpiles of all waste types been removed and disposed?
☐ Have spills that may have occurred been remediated?
☐ Have site grades been restored?
☐ Have existing groundwater monitoring wells been identified and secured?
☐ Have environmental records been submitted (groundwater and air quality monitoring if any, other state approvals)?
☐ Has the site been secured to discourage illegal dumping?
☐ Has all equipment and temporary structures been removed?
☐ Has a comparison of baseline information to conditions after the contractor has vacated the DMS been conducted?

➢ **Contact CT DEEP:** Robert Isner, Director or Gabrielle Frigon, Permitting Supervisor at 860-424-3023 or robert.isner@ct.gov or gabrielle.frigon@ct.gov