

## M E M O R A N D U M

TO: City of Groton – Dennis G. Goderre

FROM: Kristen Solloway, PE

DATE: August 17, 2018

RE: 75 Eastern Point Road  
Coastal Site Plans #309 & #310 EB  
Response to Comments

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Coastal Site Plan #309 EB  
Demolition of Two Buildings, New Lumber Store and Propane Tank  
July 31, 2018 Staff Comments

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1. The application narrative states the project is not within the flood area. The survey maps delineate the AE and VE zones, clearly showing the improvements within both.

Noted – proposed improvements are within the coastal hazard areas (AE and VE zones).

2. The application states this use is not a water dependent use. The statutory definition of water dependent includes shipyards, thus this use/improvement is water dependent as it supports the overall operation of the shipyard. Please provide a brief narrative correcting the statement and explain how the facilities support the overall operation of the shipyard.

The Electric Boat shipyard is a water dependent use. The activities proposed in this application, which are the demolition of two buildings, construction of a lumber store, and installation of a propane tank, will not affect water dependent uses of the Thames River.

In the North Yard behind Building 30 the proposed 1000 gallon propane tank and concrete pad will support the welding in Building 105 and 260. The welding in Building 105 and 260 is utilized for the buildings of the submarines. Lumber stores are used for processing wood blocking used underneath submarines during construction.

3. Provide contact name for Electric Boat personnel responsible for erosion control plans/inspection/maintenance.

A note has been added to the CD-501 indicating Marie Martin as the Electric Boat contact personnel for erosion control inquiries.

4. For propane tank provide foundation elevation and structure construction methods demonstrating compliance with Section 5.3 Flood Protection Overlay Zone, both AE and VE Zones.

The propane tank is proposed in the AE and VE FEMA Flood Zones and will comply with the City of Groton Zoning Regulations (effective December 1, 2016). The tank will be elevated on an at-grade concrete slab (approximate elevation 4.5±, to be confirmed prior to construction), securely anchored with tie-down straps to prevent flotation or lateral movement, and equipped with a screw fill cap that does not allow for the infiltration of water, which is in accordance with Section 5.3.J.3. Buoyancy calculations will be performed during detailed design of the concrete slab to prevent floatation or lateral movement. Construction methods will be in compliance with Section 3.2 of the *Protecting Building Utilities from Flood Damage Principles and Practices for the Design and Construction of Flood Resistant Building Utility Systems* published by FEMA.

5. For buildings 170 and 179 provide finished floor elevation and structure construction methods demonstrating compliance with Section 5.3 Flood Protection Overlay Zone, both AE and VE Zones.

Buildings 170 and 179 will have a finished floor elevation of approximately 6.0'±. Structure construction methods will comply with Section 5.3 Flood Protection Overlay Zone for both AE and VE zones and shall be securely anchored to resist flotation, collapse, and lateral movement due to the effect of wind and water loads acting simultaneously on all building components. Building 179 will have an open front and have 6" above grade opening between the ground and the start of the siding and Building 170 will have an open front and an 18" above grade opening between the ground and the start of siding.

Construction methods will comply with the *Protecting Building Utilities from Flood Damage Principles and Practices for the Design and Construction of Flood Resistant Building Utility Systems* published by FEMA.

6. Provide note for engineer to inspect drainage installation of piping and catch basin installation for code compliance – Plan CG-101.

A note for an engineer to inspect drainage installation of piping and catch basin installation for code compliance has been added to CG-101.

7. What is the building height of B-170 and B-179?

The height of B-170 and B-179 will be 20' and 20', respectively.

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8. Provide location, product information and photometric plan for all exterior lighting in conformance with Section 7.6 Outdoor Lighting, if applicable.

Not applicable – outdoor lighting is not proposed as new improvements.

9. Note specific requirements for the propane tank under Section 5.3.J.3 Aboveground Storage Tanks.

See response to #4.

Coastal Site Plan #310 EB  
Demolition of Multiple Buildings, Installation of New Utilities  
and Construction of Support Structures  
July 31, 2018 Staff Comments

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1. Provide a key plan showing the relation between all demolition and improvements in relation to Zones AE and VE.

A key plan showing the relation between all demolition and improvements for Coastal Site Plan #309 and #310 is provided in the Attachment A as sheet GI-100.

2. The application states this use is not a water dependent use. The statutory definition of water dependent includes shipyards, thus this use/improvement is water dependent as it supports the overall operation of the shipyard. Please provide a brief narrative correcting the statement and explain how the facilities support the overall operation of the shipyard.

The Electric Boat shipyard is a water dependent use. The activities proposed in this application, which are the demolition of several buildings, and construction of a central waste facility, sewer pump chamber, re-fueling station, and building 154 loading area, will not affect water dependent uses of the Thames River.

The proposed fuel station is an unattended station which will dispense diesel and gasoline to the fleet of vehicles and equipment and will support the overall operation of the shipyard. All waste generated during the production of submarines will be processed at the central waste facility.

3. What is being done to treat and manage storm water runoff and prevent possible pollutants from bulky waste and fueling? Ensure capacity of existing system is adequate.

These projects are part of Electric Boat's enabling projects to support the Facilities Masterplan and the proposed South Yard Assembly building. The bulky waste and fueling facilities will be covered by roofs in areas where stormwater pollution is possible. Stormwater runoff generated by paved areas will not be exposed to pollutants from the bulky waste and fueling operations.

A stormwater runoff capacity analysis, management improvements, and treatment improvements will be part of the South Yard Assembly building site improvements.

4. How high is the refueling facility's canopy?

The minimum clearance of the refueling canopy is 17 feet.

5. There appears to be no drainage improvements to support the new pavement and building 607 roof. How is drainage being addressed in this area including runoff from the slope above the east side retaining wall?

Runoff from the building 607 roof and from the slope above the east side retaining wall will mimic existing conditions and sheet flow west towards the existing driveway. The driveway drains towards an existing drainage structure where type C-L catch basin top is being proposed as part of the site improvements.

6. Provide a spill management and response plan for the fueling facility?

See attached Appendix B "Oil Spill Contingency Plan" from ENV-Groton-03 Spill Prevention, Control and Countermeasure (SPCC) Plan.

The fueling station will have a canopy above the dispensing area and the concrete slab will have positive limited barriers to contain spills.

7. How are the sorting bins accessed? What size vehicles will access the facility and can they maneuver within the drive areas?

Bobcats, forklift, and skid steers will perform operations near building 607, above the storage bins. Tractor trailers, box trucks, and pickup trucks will use the existing driveway to dispose of materials in the bins. The site is maneuverable for equipment in their designated drive areas.



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8. What will be stored in the bins and is there possibility of pollutant runoff?

Metals, plastics, trash, wood, and recyclables will be stored in the bins. The bins will be covered to prevent the possibility of pollutant runoff.

9. Provide contact name for Electric Boat personnel responsible for erosion control plans/inspection/maintenance.

A note has been added to the CD-501 indicating Marie Martin as the Electric Boat contact personnel for erosion control inquiries.

10. Where is the guard tower being relocated to? Will it be relocated under this permit or future? If future where will it be stored?

The guard tower is being relocated between buildings 83 and 84. Plan sheet CS-101 has been revised to show the guard tower relocation.

11. Provide building elevations for Building 607 and provide building height. Provide general building elevations for all facades.

The Central Waste Facility will be two levels; the ground level will have a concrete bulkhead that will contain bulky waste, scrap metal, plastic recycling, trash and wood collection containers. The upper level of the bulk head will be paved to give access for forklifts to dump directly into the applicable container. All of the containers will be covered under an awning that will be structural steel and metal pan roof. The Central Waste Building (Building 607) will be located on the upper level east of the bulk head, self-contained and will be a metal building system with a height of 26 feet. Building elevations for the facades will be provided in the building's permit application.

12. Provide location, product information and photometric plan for all exterior lighting in conformance with Section 7.6 Outdoor Lighting.

Not applicable – outdoor lighting is not proposed as new improvements.

13. What are hours of operation of building 607 and explain possibility and level of noise?

Building 607 will be manned first shift but will be open 24/7. The level of noise will be typical for industrial use.

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14. Provide location of new building 607 (with dimensions) in context of property lines to confirm setbacks are met.

Dimensions and property line setbacks associated with building 607 have been added to plan sheet CS-101.

15. The stairs near the bins need to be covered per building code.

Plan sheet CS-101 has been updated to indicate that the stairs near the bins will be covered per building code.

16. Please provide an 11x17 plan showing the full extents of the demolitions and improvements and in context to property lines.

Plans, size 11"x17", showing the full extents of work (demolitions and improvements) in context to the property lines are attached as Appendix A to this memorandum.

17. Construction of building 607 requires substantial cut of earthen material. Where will this material be disposed of? If on site where? If off site please note standards outlined in Section 7.3 Filling and Removing of Earth Products. (Please note: This section refers to the import or export of material not moving material on site.)

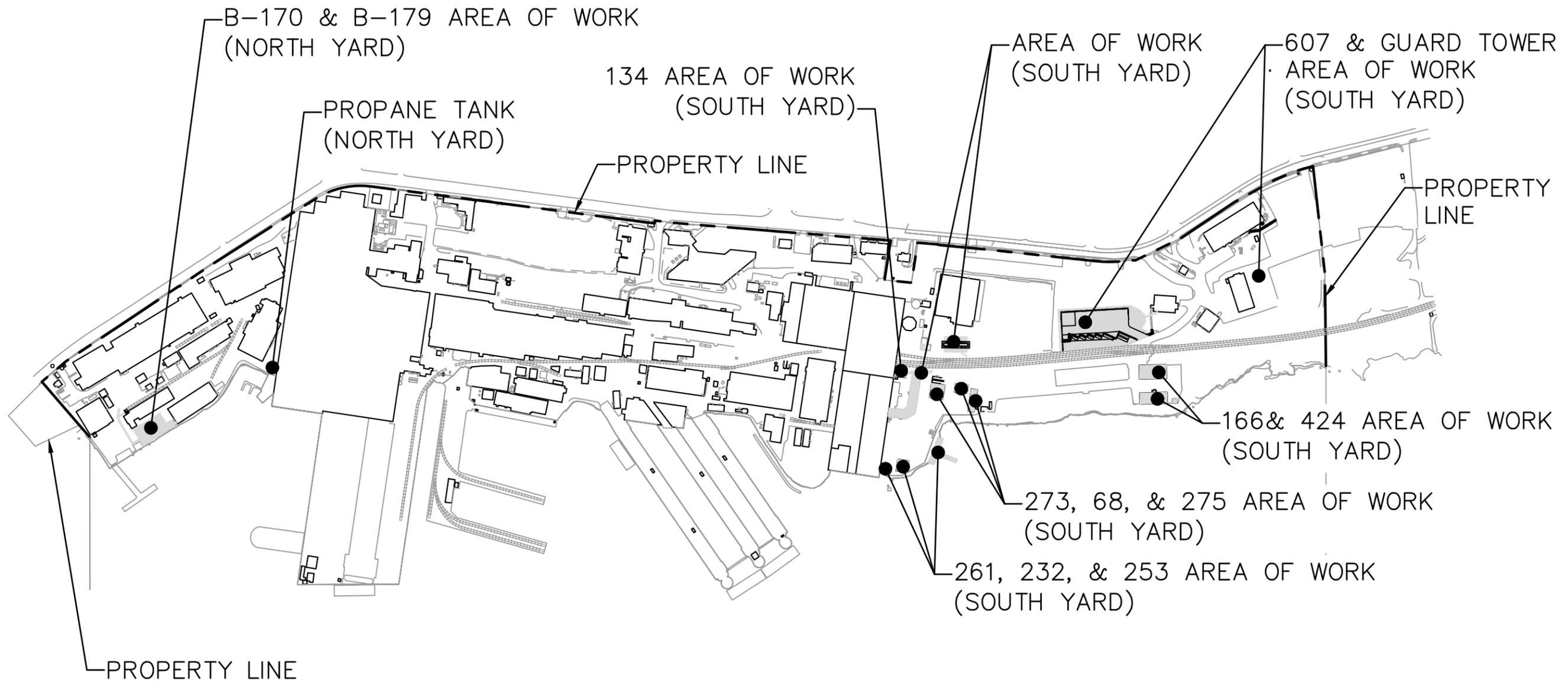
The material will be disposed of at a Connecticut landfill/waste transfer facility. A confirmation of material acceptance will be obtained from the facility prior to material removal and disposal.

END OF MEMO

Attachments:

- (A) Facilities Master Plan – Enabling Projects  
Electric Boat – Groton Campus  
Sheets GI-100, 101 & 102  
Dated: 08/17/2018  
By: Fuss & O'Neill, Inc.
- (B) Appendix B  
Oil Spill Contingency Plan  
ENV-GROTON  
SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN - GROTON  
By: Electric Boat

File Path: J:\DWG\970570A11\Civil\Plan\North\_Yard\_Projects\19970570A11\_STP01-N.dwg Layout: GI-100 Plotted: Thu, August 16, 2018 - 12:03 PM User: Imello  
MS VIEW: PLOTTER: DWG TO PDF-PC3 CTB File: FO.STB



SCALE:	HORZ.: 1"=400'
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DATUM:	HORZ.: NA
	VERT.: NA
	0 200 400
	GRAPHIC SCALE

**FUSS & O'NEILL**  
146 HARTFORD ROAD  
MANCHESTER, CONNECTICUT 06040  
860.646.2469  
www.fandob.com



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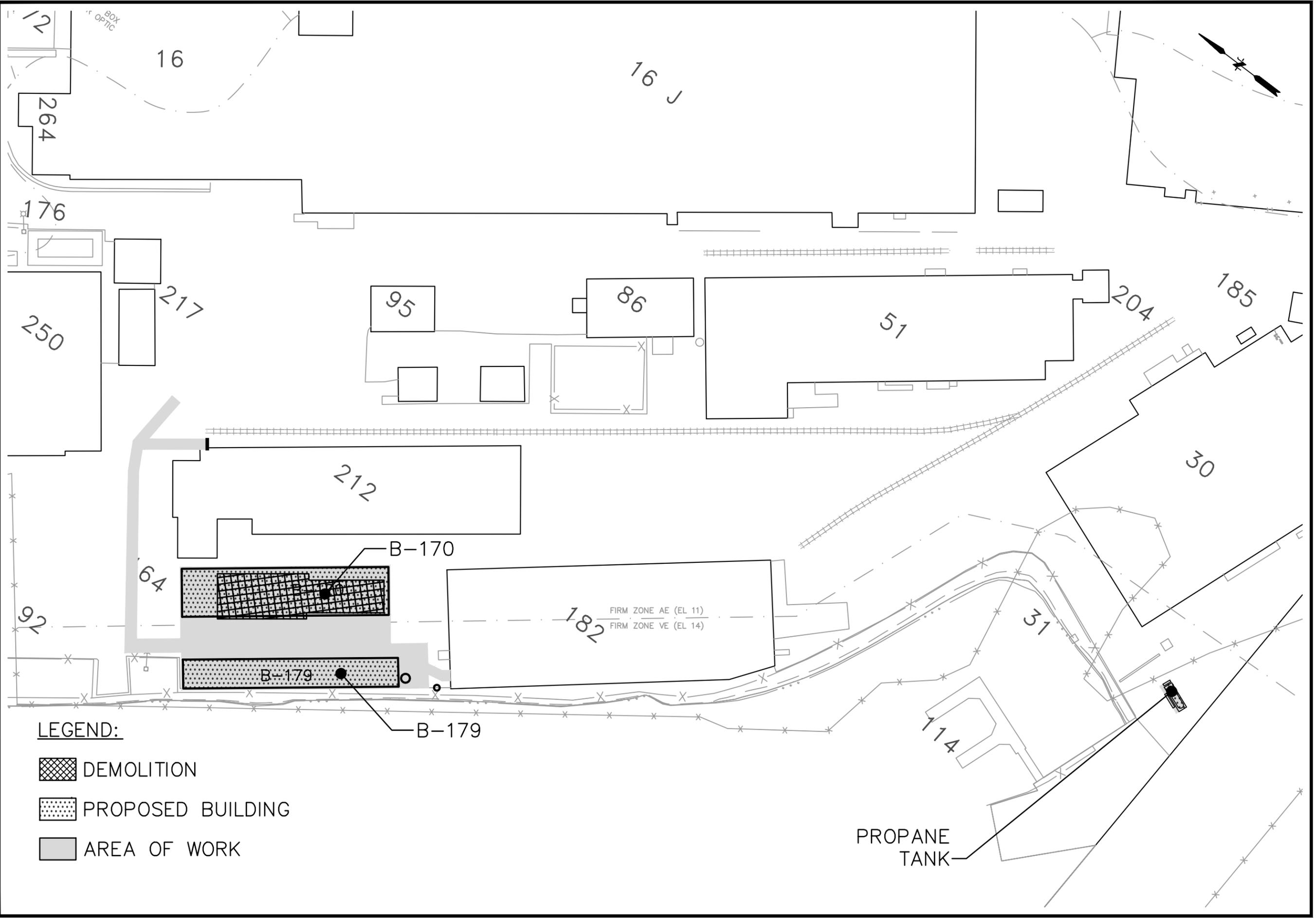
FACILITIES MASTER PLAN - ENABLING PROJECTS  
**OVERALL IMPROVEMENTS PLAN**  
ELECTRIC BOAT - GROTON CAMPUS

PROJ. No.: 1997 0570.A11  
DATE: 08/17/2018

**GI-100**

GROTON

File Path: J:\DWG\970570A11\Civil\Plan\North Yard Projects\19970570A11\_STP01-N.dwg Layout: GI-101 Plotted: Thu, August 16, 2018 - 12:03 PM User: Imello  
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**LEGEND:**

-  DEMOLITION
-  PROPOSED BUILDING
-  AREA OF WORK

SCALE: HORIZ.: 1"=50'	VERT.: 1"=25'
DATUM: NA	
HORIZ.: NA	
VERT.: NA	
GRAPHIC SCALE	

**FUSS & O'NEILL**  
146 HARTFORD ROAD  
MANCHESTER, CONNECTICUT 06040  
860.646.2469  
www.fandob.com

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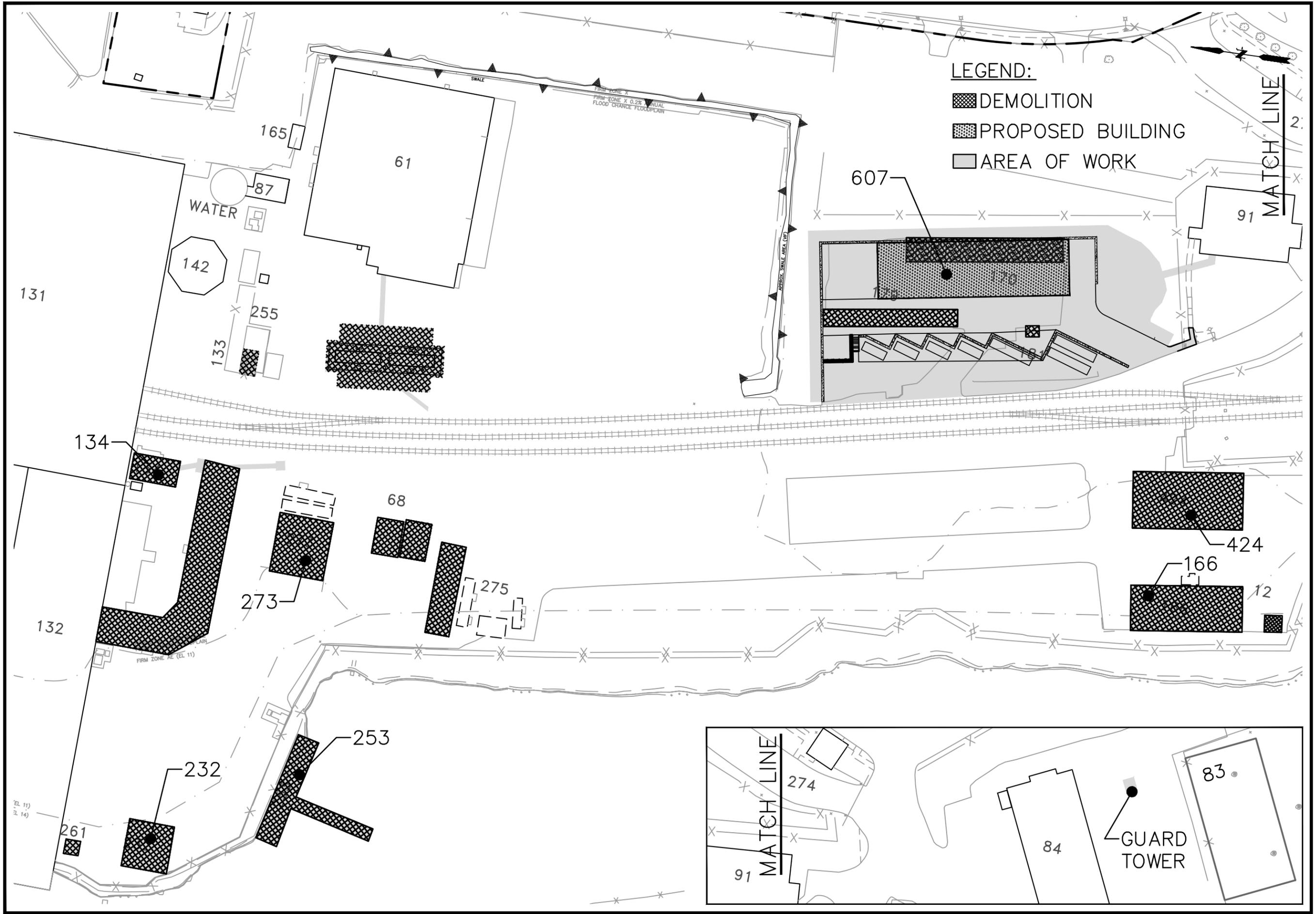
FACILITIES MASTER PLAN - ENABLING PROJECTS  
DEMOLITION & NEW IMPROVEMENTS  
NORTH YARD

GROTON

PROJ. No.: 1997 0570.A11  
DATE: 08/17/2018

**GI-101**

File Path: J:\DWG\1970570A11\Civil\Plan\South Yard Projects\1970570A11\_STP01-SY.dwg Layout: GI-102 Plotted: Thu, August 16, 2018 - 12:04 PM User: imello  
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LEGEND:

- DEMOLITION
- PROPOSED BUILDING
- AREA OF WORK

SCALE: HORZ.: 1"=80'  
VERT.: 1"=40'  
DATUM: HORZ.: NA  
VERT.: NA  
GRAPHIC SCALE

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146 HARTFORD ROAD  
MANCHESTER, CONNECTICUT 06040  
860.646.2469  
www.fandob.com

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FACILITIES MASTER PLAN - ENABLING PROJECTS  
DEMOLITION & NEW IMPROVEMENTS  
SOUTH YARD

PROJ. No.: 1997 0570.A11  
DATE: 08/17/2018

GI-102

GROTON

**APPENDIX B**  
**OIL SPILL CONTINGENCY PLAN**

## OIL SPILL CONTINGENCY PLAN

### BACKGROUND

Electric Boat builds, tests and repairs submarines for the United States Navy. These activities encompass approximately 100 acres along the Thames River. Due to the extreme complexity of EB operations, EB maintains multiple procedures related to general emergency response actions, and incorporates detailed notification and response actions into specialized procedures where applicable. EB also relies on specialized and general training provided to EB employees, as detailed in SPCC Plan section 5.5.

### PURPOSE

This Contingency Plan satisfies all requirements inclusive to 40 CFR 112.7 and represents an overview of the notification and response actions required by EB employees, contractors and visitors in response to an oil spill at the EB Groton Shipyard in order to prevent or minimize impact on the following water uses, in order of priority for protection:

- Thames River
- EB Stormwater Drainage System
- Groundwater
- Groton City Sanitary Sewer System

### A. Discovery, Response Notification and Recovery Management

1. EB procedure SP 07-14, *Emergency Response – Groton*, outlines the overall emergency response organization authorities, responsibilities and duties, and associated notifications for the Groton shipyard, including oil spills.
  - a. Any persons who cause or become aware of an oil spill on EB property must report the spill immediately to the EB Fire Department by calling x33333, or 860-433-3333. Contractors and visitors shall perform in accordance with briefings administered upon provision of access to the shipyard. Contractors shall additionally follow direction provided in the *EB Contractor Safety, Health and Regulations Manual*.
  - b. For oil spills, the EB Fire Department assumes responsibility for operational leadership and primary response actions (e.g. stopping, controlling and cleaning up the spill). Figure B-1 details on-site equipment and materials available for immediate response.

### Figure B-1 EB Fire Department Hazardous Material Response Equipment

<https://www.ebnet.gdeb.com/homepages/departments/503/SPCC/FigureB1.pdf>

ENV-GROTON-03  
SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN - GROTON

- c. SP 07-14 directs the availability and deployment of all shipyard personnel and material resources, as necessary. The EB Fire Department notifies Environmental Resources Management and other EB departments, as required, to assist in stopping, controlling, or cleaning up the spill, or restoring equipment and facility conditions to a safe operating condition.
  - d. The EB Fire Department may invoke mutual aid agreements, as necessary.
  - e. This SP identifies persons authorized to activate EB's emergency control center and references additional prearranged procedures to be utilized, as applicable, for major disasters that may potentially present a risk to facility oil piping or storage systems. EB does not meet the substantial harm criteria and, therefore, does not anticipate the potential to produce an oil release exceeding the response capability of state, local or regional authorities.
2. EB procedure SP 07-11, *Water Pollution Control* is applicable to all EB personnel and details the authorities, responsibilities, duties, and associated notifications for any oil spill occurring at the Groton shipyard.
- a. Any EB employee shall immediately notify the EB Fire Department in the event of an oil spill. Following notification, employees shall take appropriate actions, based on knowledge and available resources, to prevent or minimize the release of oil to the Thames River, EB Storm Drain System, Groundwater, or the Groton City Sanitary Sewer System, and support the EB Fire Department response as directed.
  - b. The EB Fire Department will notify Environmental Resources Management upon notification of any spill at the Groton shipyard.
  - c. When necessary, Environmental Resources Management or the EB Fire Department will initiate emergency response support from the contracted spill response vendor. The response vendor is contracted to provide, within two (2) hours following notification, adequate labor, equipment, and material for containment and clean-up of any oil spill.
  - d. Environmental Resources Management or the EB Fire Department will notify and provide all required information to the State of Connecticut Department of Energy and Environmental Protection for all spills, and the National Response Center as required, and in accordance with regulations summarized in SPCC Plan section 5.1.3.
  - e. Environmental Resources Management is responsible for follow-up notifications to state or federal agencies as necessary.
3. Environmental Resources Management procedure DI503-EMS-23, *Spill Reporting Policies and Procedures*, directs maintenance of the site oil spill log and provides additional instructions for written follow-up notifications related to an oil spill, when applicable.

**B. Resources for Response and Recovery Management**

1. EB maintains sufficient equipment, material and personnel resources continually available to respond and recover from potential release quantities described in Table 5-1 of EB's SPCC Plan for the Groton Shipyard.
  - a. Portable spill response kits. Kits are strategically located throughout the facility in industrial work areas where oil storage or handling is routinely performed, or equipment containing oil may be staged or operated. These materials are intended to support immediate response capability for persons causing or discovering a spill, and while awaiting EB Fire Department on-scene response.
  - b. The EB Fire Department maintains a stock of equipment and materials to respond and recover from potential release quantities described in Table 5-1 of EB's SPCC Plan for the Groton Shipyard and occurring landward of the coastline. Figure B-1 details on-site equipment and materials available for immediate response. The EB Fire Department is manned continuously and adequately to enable sufficient spill response and operational response leadership.
  - c. EB Transportation maintains one (1) 1,000-gallon and one (1) 5,000-gallon vacuum tanker capable of recovering oil from containments and storm drain system catch basins and gravity separators.
  - d. EB maintains a contract with a spill response contractor for the provision of labor, equipment and materials. Initial emergency response will be provided within two (2) hours following notification and is sufficient to respond and recover from potential release quantities described in Table 5-1 of EB's SPCC Plan for the Groton Shipyard, and occurring either landward or seaward of the coastline.
  - e. EB procedure SP 07-14, *Emergency Response – Groton*, directs that all EB employees are responsible to support the EB Fire Department or other on-scene command entity upon request. This SP, in conjunction with EB's spill response contractor agreement, represents a written commitment of manpower, equipment and materials required to expeditiously control and remove any potential release quantity as described in Table 5-1 of EB's SPCC Plan for the Groton Shipyard.
2. EB maintains several resources capable of serving as the response operations center if necessary in response to a release of oil.
  - a. The EB Fire Department maintains a mobile command vehicle capable of supporting communications and other resources necessary for response to any anticipated oil release occurring at EB. The response leader may deploy additional on-site mobile or portable emergency response resources (e.g., tent, lighting, generator) as required.

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN - GROTON

- b. EB Environmental maintains an indoor office work center capable of providing adequate communications and other resources for any anticipated oil release occurring at EB.
  - c. EB's emergency control center provides adequate communications and other resources to support response operations for any potential oil release occurring at EB, as well as any severe localized event (e.g. weather, security) that may present a potential risk to bulk oil storage identified in this SPCC Plan.
3. EB maintains policies and procedures to facilitate the recovery of damages and enforcement measures related to a release of oil occurring at EB. Due to the complexity of EB operations these policies and procedures are numerous and structured to address a wide variety of conditions. These policies and procedures are available to EB employees and therefore are not specifically integrated into this Contingency Plan.