PROJECT NARRATIVE

The purpose of this project is to expand the current loading/filling capability of the existing used oil transfer station at 120 Forbes Avenue (the "Property"). The project includes the installation of two (2) new 72-ft diameter above-ground storage tanks to store an additional 3,645,000 gallons of used oil, along with associated piping.

The new tanks will be installed within the existing spill containment berm in areas that previously contained a 110-ft diameter tank (3.36M gallons) and three riveted tanks (1.25M gallons) that were removed approximately ten years ago.[1] Upon completion of this project, the total on-site storage volume for the Property will be approximately 6,418,740 gallons. Overall, the total storage capacity of the tank farm will remain less than previously approved storage volumes for the site.

The proposed project involves 0.96 acres of this 6.90-acre Property. The area of soil disturbance is limited to 26,200 SF (0.6 acre) for the installation of the two tanks and compensatory flood storage. The area where the proposed piping for this project will be installed involves an additional 15,500 SF (0.36 acre); however, the piping installation will not involve any soil disturbance as all will be installed above ground.

The Property is located within the coastal boundary of the City of New Haven according to the 1979 Coastal Resources map prepared by the Coastal Area Management Program, Connecticut Department of Environmental Protection. The resources on and adjacent to the Property include: Developed Shoreland and Shoreland, Coastal Flood Area, Estuarine Embayments, and Intertidal Flats (which are located on the adjacent property to the north). No portion of the proposed construction is within the limits of the identified Estuarine Embayments or Intertidal Flats, which are located to the west of the site. The project will have little to no impact on any coastal resources on or adjacent to the Property.

Given that the site and proposed storage tanks will be located within the existing floodplain and below the base flood elevation, a total of approximately 1,815 cubic yards of material will be removed from the site to provide the required compensatory storage volume. The project will use soil erosion and sediment controls pursuant to CTDEEP 2002 Connecticut Guidelines for Soil Erosion and Sediment Control

[1] The Commission also approved the installation of nine tanks (capacity 6,964,050) to replace those that were removed, but those tanks were never constructed. (See CSPR #1445-04 dated 10/22/2010; vol. 8617, pg. 165).

during construction in order to limit the spread of construction or earthen debris. Additionally, the project will not create any new drainage outfalls and will not significantly alter the site's existing drainage patterns.

The project provides for sound economic growth for the City and is consistent with the capability of the land and surrounding resources to support this use without adverse impact on coastal resources. The development footprint of the project is limited to areas that were previously developed/disturbed in order to conserve and protect a significant area of coastal resources located on the Property, and both new tanks will be located within the existing containment berm.

In addition, this project supports the City's desire to promote commercial and industrial waste recycling programs. Safety-Kleen collects and recycles used motor oil and used antifreeze through a closed loop system from garages and gas stations. The Property currently functions as a collection terminal where these materials are delivered, stored, and shipped to recycling facilities for further processing before being redistributed to end users. The proposed activity will increase Safety-Kleen's collection capabilities at the Property and will allow for greater efficiencies and expansion of its recycling efforts.