



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 Broadway
New York, NY 10007-1866

September 25, 2018

HAND DELIVERY

Office of the Regional Hearing Clerk
U.S. Environmental Protection Agency
290 Broadway, 16th Floor
New York, NY 10007
Attention: Karen Maples

Dear Regional Hearing Clerk:

Enclosed please find a signed copy of the City of Peekskill's Supplemental Environmental Project ("SEP") proposal that should be included as an attachment to the Consent Agreement and Final Order, Docket No. CWA-02-2018-3314. An unsigned copy of the SEP proposal was included in the original filing. Please let me know if you have any questions about this attachment.

Sincerely,

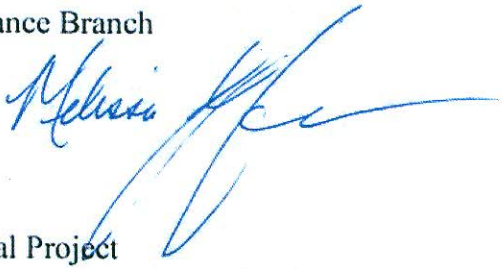
A handwritten signature in cursive script that reads "Lauren Charney".

Lauren Charney
Assistant Regional Counsel
Office of Regional Counsel, EPA Region 2

MEMORANDUM

Office of the Corporation Counsel

TO: Lauren Charney, Esq., Assistant Regional Counsel
Kimberly Mceathron, DECA-Water Compliance Branch

FROM: Melissa G. Ferraro, Corporation Counsel 

DATE: August 10, 2018

RE: City of Peekskill supplemental Environmental Project
Docket No. CWA-02-2018-3314

This memorandum provides information regarding a proposed Supplemental Environmental Project (SEP) consisting of the installation of a porous pavement parking lot at 960 Main Street in the City of Peekskill. The City of Peekskill is providing this information to assist in the preparation of a Consent Agreement/Final Order (CA/FO) for the referenced matter.

Background: The City of Peekskill owns and operates a municipal parking lot located at 960 Main Street.



Go gic Maps

The parking lot is in need of repaving. In order to provide a more environmentally friendly, and therefore greener solution to paving this parking lot, the City of Peekskill is planning to repave this lot with a porous asphalt pavement. The porous asphalt pavement shall include 2 rolls of Geotextile Fabric Miraft 500x, approximately 12 inches of #3 stone, approximately 2 inches of #1 stone and approximately 2 ½ inches of porous pavement.

Porous Asphalt allows water to drain through the pavement surface into a stone recharge bed and infiltrate into the soils below the pavement. By allowing the water to drain into the pavement, it reduces the demand on storm sewer system.

SEP Description: The SEP will be performed in the existing municipal parking lot located at 960 Main Street in the City of Peekskill. Specifically, the City staff will prepare the parking lot for paving and the City will seek resurfacing bids pursuant to the City of Peekskill and New York State Procurement policies in order to provide the porous asphalt paving. The City estimates the total cost of this project will be approximately \$17,596.80. This total includes 300 MT of #3 Stone at \$16.18 MT, totaling \$4,854.00; 80 MT of #1 Stone at \$16.16 MT, totaling \$1,328.80; 110 MT porous asphalt at \$95 per ton, totaling \$10,450; and Geotextile Fabric-Mirafi 500x, 2 rolls at \$500 per roll, totaling \$1,000.

Completion Date: The SEP is expected to be completed by October 31, 2018.

Compliance with EPA SEP Policy: For the reasons set forth below, the City of Peekskill believes the proposed SEP meets the criteria contained in EPA's SEP policy.

This alternative method of paving with porous asphalt has many environmental benefits and is an innovative tool for managing storm water runoff and controlling the damage that can be caused by runoff. During a storm or steady rainfall, water runoff flows over traditional pavement and picks up pollutants, which are then transferred into the surrounding landscape or local streams and stormwater conveyance system. With the porous asphalt solution at the 960 Main Street municipal parking lot, that potential environmental damage is greatly reduced. Furthermore, porous asphalt pavement is a multifunctional, low impact development (LID) technology, which integrates ecological and environmental goals for a site with land development goals, reducing the net environmental impact. With the many environmental benefits and reduced risks to public health, this project conforms to all of the definitions of a Supplemental Environmental Project as requested by the United States Environmental Protection Agency.

The current lot at 940 Main Street is in dire need of a facelift. Located within one of the downtown business areas, it sees a constant flow of visitors, who visit the commercial establishments surrounding this lot. During wet weather and days after, water (and Ice) remains atop the surface, which creates a breeding ground for mosquitos as well as other negative and unwanted pests associated with wet/moist environments. Physically speaking mud, dirt and debris are tracked throughout the area as people walk along the lot. During winter there is a hazard of ice, which is mitigated with sodium chloride. Our plan of porous pavement will eliminate this aesthetically objectionable and environmentally unfriendly situation. We plan to open up the lot to allow more sunlight to penetrate the area by cutting back tree limbs that are overhanging. We will look to remove the larger older trees and replant with more urban species of trees that will flower in spring and not grow to enormous and dangerous heights. Since the lot is 90 feet by 65 feet, a rainfall of 1 inch will shed approximately 3,500 gallons of water out of the stormwater conveyance system and into the ground beneath it. Since the lot is pervious to rainwater there will be a reduction or possibly elimination of additional salt being added to the ecosystem.

Prior to construction, the Certified Arborist employed by the City will survey the trees and provide a recommendation to maximize the environmental benefits associated with this project.

Our MS4 coordinator will add this location to the minimum Control Measure 3 – Illicit Discharge Detection and Elimination by inspecting the site once every three years. In addition, it will be added to Minimum Control Measure 5 - Post Construction database as a site that is inspected once every year to ensure proper operation (no pooling or puddling) of the pervious pavement. If maintenance is required, the DPW staff will be notified and the issued will be addressed.

Specific information needed to assist in preparation of the CA/FO is set forth below:

1. Description of municipal parking lot:

The municipal parking lot located at 960 Main Street in the City of Peekskill is a 65' by 90' parking lot that holds approximately 20 parking space parking lot for use by permit holders and daily/nightly parking. The parking lot is currently paved with regular asphalt and is in need of repaving.

2. Dimensions of municipal parking lot:

The municipal parking lot located at 960 Main Street in the City of Peekskill is approximately 65' by 90'. The City of Peekskill plans to repave the entire parking lot in the porous asphalt paving.

3. Community involvement in SEP development:

The community utilizes this municipal parking lot on a daily and nightly basis. The City staff maintains this parking lot for use by the community when parking in the City's downtown business district when visiting local shops, the theater and restaurants.

4. How the City estimated the cost (quotes, engineer certified, etc.):

The cost of the SEP was based upon estimates provided by the City Engineer considering the Department of Public Works staff will prepare the lot for repaving with the porous asphalt and will seek competitive bidding for the actual repaving using the porous asphalt product. This estimate will vary, depending on the competitive bidding responses received.

On behalf of the City of Peekskill, thank you for your consideration of this SEP. Please contact the City of Peekskill if you have any questions or concerns.

cc: Richard A. Leins, City Manager
Brent VanZandt, City Engineer
David Rambo, Water & Sewer Superintendent