



Vermont Department of Environmental Conservation

Agency of Natural Resources

FACILITIES ENGINEERING DIVISION
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Mr. Glenn Seward, Selectboard Chair
Authorized Representative
Town of West Windsor
P.O. Box 6
Brownsville, Vermont 05037

January 21, 2015

Re: **Categorical Exclusion**
Brownsville Sewer System
RF1 -167 (Vermont/EPA CWSRF Loan)

Dear Mr. Seward:

The Department of Environmental Conservation has determined that the proposed construction of the Brownsville Sewer System project and ultimate connection to the Town of Windsor sewer may be exempted from detailed environmental review as the project presents no significant environmental impact. The Department's environmental review procedures require a **30-day public comment period** following the issuance of this Notice. During this period, the public may submit substantive comments demonstrating that the Determination is in error. If no comments are received, the project qualifies for a Categorical Exclusion and is exempt from detailed environmental review.

Note that the comment period begins on January 21, 2015 and ends on February 20, 2015.

Further, this determination is **conditional**. As stated in a directive dated June 19, 2014 (see attached), the Town of Windsor must resolve overflow issues at Pump Station #2 before the Department can make positive environmental findings. Prior to submitting the Final Design for the Brownsville Sewer System, you are obligated to submit documentation confirming that the Town of Windsor has performed the prescribed corrective measures.

During the public comment period, documents pertinent to the project must be publicly available. These include the **enclosed** supporting documentation for the Categorical Exclusion, the Facilities Plan and Environmental Information Document prepared by your engineering consultant, and a summary of environmental review procedures. A full listing of the required documents is attached for your convenience. Please call (802-522-2192) if you have any questions or concerns.

Sincerely,

Robert Pelosi, E.I.
Pollution Control Design Engineer

Documents Enclosed for Public Comment Period (30 Days)

1. Notice of Determination of Eligibility for Categorical Exclusion (Signed by Eric Blatt, P.E., Director, Facilities Engineering Division).
2. Evaluation of Eligibility for Categorical Exclusion (Approved by Eric Blatt, P.E., Director, Facilities Engineering Division).
3. Link to : Environmental Review Procedures for Projects Funded Through the Vermont/EPA Revolving Loan Program.

Additional Documents Needed for Public Comment Period (30 Days)

4. Facilities Plan titled "*Brownsville Sewer System Facilities Planning, Preliminary Engineering Report*" and dated April 2013, by Aldrich & Elliott, PC of Essex Jct., Vermont.
5. Environmental Information Document titled "*Town of West Windsor, Vermont, RF1-167*" and dated October 2014, by Aldrich & Elliott, PC of Essex Jct., Vermont.

Mailing List (e-mail)

Joseph J. Duncan, P.E. and **Nathan Pion**, E.I., Aldrich+Elliott, PC
Julia Butzler, Environmental Analyst, Wastewater Program, VT-DEC, Watershed Management Division
Jeff Fehrs, Environmental Engineer, Wastewater Program, VT-DEC, Watershed Management Division
Terry Shearer, Regional Engineer, VT-DEC, Drinking Water and Groundwater Protection Division -- Springfield Office
Jeff Svec, Asst. Regional Engineer, VT-DEC, Drinking Water and Groundwater Protection Division -- Springfield Office
Rebecca Chalmers, District Wetland Ecologist, Wetlands Program, VT-DEC, Watershed Management Division
Ryan McCall, Environmental Analyst, Stormwater Program, VT-DEC, Watershed Management Division
Todd Menees, P.E., Rivers Management Engineer, Rivers Program, VT-DEC, Watershed Management Division
Sacha Pealer, Floodplains Manager, Rivers Program, VT-DEC, Watershed Management Division
Everett Marshall, Information Manager, Nongame and Natural Heritage Program, VT Dept of Fish & Wildlife
April Hensel, Regional Coordinator, Vermont Natural Resources Board -- Springfield Office
Devin Colman and Scott Dillon, Archeologist, Division for Historic Preservation, VT Dept. Housing and Community Affairs
Martha Abair, US Army Corps of Engineers
Eric Blatt, P.E., Director, VT-DEC, Facilities Engineering Division
Tom Marsh, Town Manager, Town of Windsor, VT
Jeff McDonald, P.E., Fuss & O'Neill, Inc.



NOTICE OF DETERMINATION OF ELIGIBILITY FOR CATEGORICAL EXCLUSION

Town of West Windsor, Vermont

Brownsville Sewer System

In accordance with Section VII of the Department's Environmental Review Procedures for Projects Funded Through the Vermont/EPA Revolving Loan Program, the Town of West Windsor, Vermont, has requested that its proposed Brownsville Sewer System project be exempt from detailed environmental review through Categorical Exclusion.

The proposed project involves constructing a collection sewer for a portion of the designated growth area in the Town of Brownville, Vermont. The project is limited to the following:

- A corridor parallel to Route 44 from Seems Road to Brook Road (west to east) and
- A corridor from the Albert Bridge School along the Brownsville-Hartland Road to the intersection with Route 44 (north to south).

A map of the project area is attached for convenience.

The collection sewer consists of new 8" gravity sewer lines, two new pump stations, associated force mains and refurbishment of one existing pump station. The system is to connect 22 users (residential, commercial, and municipal) in the Village of Brownville to the existing Ascutney Mountain Resort Pump Station No. 1 and, ultimately, to the Town of Windsor sewer.

Our consideration of the Town's request for Categorical Exclusion included a detailed review of the following documents:

Facilities Plan titled "*Brownsville Sewer System Facilities Planning, Preliminary Engineering Report*" and dated April 2013, by Aldrich & Elliott, PC of Essex Jct., Vermont.

Environmental Information Document titled "*Town of West Windsor, Vermont, RF1-167*" and dated October 2014, by Aldrich & Elliott, PC of Essex Jct., Vermont.

Upon completion of its independent evaluation, the Department has determined that the project meets the criteria for receiving a Categorical Exclusion. Specifically, the project eliminates existing pollution points, provides a limited number of users within a designated growth area access to a sanitary sewer, is conditioned upon correcting existing pump station deficiencies in the receiving Town of Windsor sewer, and neither affects treatment nor diminishes capacity at the Town of Windsor wastewater treatment facility.

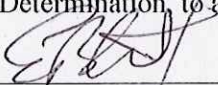
Further information on the project and this Determination is available for inspection at the following locations:

**Town of West Windsor, Town Office, 22 Brownsville-Hartland Road, P.O. Box 6, Brownsville,
Vermont 05037**

Aldrich+Elliott, P.C., 6 Market Place, Suite 2, Essex Jct., Vermont 05452

**Vermont Department of Environmental Conservation, Facilities Engineering Division,
National Life Building, MAIN 1, 1 National Life Drive, Montpelier, Vermont 05620-3510
Telephone: (802) 828-1550 (land line)**

No significant administrative action will be taken on this project for thirty (30) days from issuance of this Notice of Determination, to allow for public response.



Eric Blatt, P.E., Director
Facilities Engineering Division

January 21, 2015



VERMONT

Vermont Department of Environmental Conservation

Agency of Natural Resources

FACILITIES ENGINEERING DIVISION
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TO: Eric Blatt, P.E., Director, Facilities Engineering Division
FROM: Robert Pelosi, E.I., Pollution Control Design Engineer
DATE: January 21, 2015
SUBJECT: Town of West Windsor
Brownsville Sewer System

Evaluation of Eligibility for Categorical Exclusion from Detailed Environmental Review

A. Project Identification

Project Name: Town of West Windsor
Brownsville Sewer System

Address: Mr. Glenn Seward, Selectboard Chair
Authorized Representative
Town of West Windsor
P.O. Box 6
Brownsville, Vermont 05037

Project Location: A corridor parallel to Route 44 from Seems Road to Brook Road (west to east) and a corridor from the Albert Bridge School along the Brownsville-Hartland Road to the intersection with Route 44 (north to south).

Vermont/EPA CWSRF Loan Program Project No.: RF1 -167

B. Summary of Environmental Review

In accordance with Section VII of the Department's Environmental Review Procedures for Projects Funded Through the Vermont/EPA Revolving Loan Program, the Town of West Windsor, Vermont, has requested that its proposed Brownsville Sewer System project be exempted from detailed environmental review through Categorical Exclusion, as detailed in the Procedures.

The applicant's requests, and the following pertinent documents, have been reviewed, and our findings are summarized below:

Facilities Plan titled "*Brownsville Sewer System Facilities Planning, Preliminary Engineering Report*" and dated April 2013, by Aldrich & Elliott, PC of Essex Jct., Vermont.

Environmental Information Document titled "*Town of West Windsor, Vermont, RF1-167*" and dated October 2014, by Aldrich & Elliott, PC of Essex Jct., Vermont.

1. Project Description

The Town of West Windsor is located in Windsor County, Vermont.

The proposed project includes the following construction:

- Installation of an 8" gravity sewer, aligned west to east, on Route 44 from Seems Road to the Town Offices;
- Installation of an 8" gravity sewer, aligned north to south, along Brownsville-Hartland Road from the Albert Bridge School to the Town Offices;
- Construction of Pump Station No. 2 near the Town Offices at the intersection of Brownsville-Hartland Road and Route 44 to convey wastewater east under Beaver Brook to Manhole MH 1-4 on the south side of Route 44;
- Installation of an 8" gravity sewer that extends from Manhole MH 1-4 to Brook Road along the south side of Route 44; and
- Construction of Pump Station No. 1 that intercepts the gravity sewer and conveys the wastewater to the existing Ascutney Mountain Resort Pump Station No. 1 for discharge to the Town of Windsor sewer.

2. Justification for Categorical Exclusion

We have determined that the project meets the criteria for receiving a Categorical Exclusion. Specifically, the project eliminates existing pollution points, provides a limited number of users within a designated growth area access to a sanitary sewer, and neither affects treatment nor diminishes capacity at the Town of Windsor wastewater treatment facility. Further, provided the Owner demonstrates that existing pump station deficiencies in the receiving Town of Windsor sewer system are corrected, the project does not involve (create) serious local or environmental issues, or meet any of the criteria that would result in denial of an Exclusion.



Vermont Department of Environmental Conservation

Watershed Management Division

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Agency of Natural Resources

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Tom Marsh, Town Manager
Authorized Representative
Town of Windsor
29 Union Street
Windsor, Vermont 05089

Glenn Seward
Authorized Representative
Town of West Windsor
PO Box 6
Brownsville, VT 05037-0006

via email:

June 19, 2014

Re: Site Visit and Recommendations

**Ascutney Mountain Sewer: Pump Stations #1 & #2
Towns of West Windsor and Windsor**

Dear Tom & Glenn:

Jeff Fehrs, Dan Mason, and Lynnette Whitney met with you both, Windsor's operator, and Joe Duncan on Wednesday, May 28, 2014 for the purpose of examining the former Ascutney Mountain Sewer's two pump stations, Pump Station #1 located in and owned by the Town of West Windsor and Pump Station #2 located in and owned by the Town of Windsor. The problem we were working on resolving pertained to Pump Station #2 and three reported overflows during the 2013 calendar year. An enforcement investigation about the pump station #2 overflows was started to protect waters of the State.

Due to recent changes in ownership as well as changes in the operation of the pump stations and installation of new controls by Mission Communications, the towns requested a meeting to evaluate the current situation.

The Ascutney Mountain Sewer property transferred in February of 2014. The Mission control system is now installed, which is preset to make sure that there is power at Pump Station #2 prior to discharge from Pump Station #1.

Tom Marsh and Glenn Seward, Authorized Representatives
Ascutney Mountain Sewer Pump Stations #1 & #2
Request for Action
June 19, 2014

Observations at Pump Station #2:

1. There are only three floats. It did not appear that they ran with a lead/lag as designed.
2. The seal on the flapper valve between the emergency storage tank and the wet well appeared to not seat properly allowing wastewater in the wet well to flow into the emergency storage tank. The result is a decrease in the volume available for emergency storage and an increase in the volume pumped.
3. Dan Mason reported that he formerly observed pressure in the flapper valve between the valve vault and the wet well. This was not repeated during our visit.
4. The emergency overflow into the forcemain appears to be not functional. Dan Mason reported that this may be due to the check valve not working properly.
5. After the pumps shut down, air was observed to "burp" back into the wet well. This cause for this was not known. The question was raised about air releases in the forcemain and possible failure of the check valves. It is not known if there have been any maintenance performed on any possible air release valves. The current operator is unaware of air release valve locations.
6. There is a pipe invert into the wet well that does not have an obvious origin.
7. There was a communications failure with the Mission control system and alarms were not sent to the wastewater plant while we were on site. Also Mission control communications did not come back up during the course of the site visit. Logs indicate that this is regular occurrence happening at a frequency of 3 to 4 times in 10 days. This rate of error suggests that the system is not sufficiently reliable.

(On further discussion with Jon Champlin, the vendor, it was determined that the communications unit in one of the pump stations went down and needed rebooting. Additionally, a firmware update was required at the unit to address the communication fault issue. Champlin indicated that he has walked the operator through the firmware update.)

8. Access at this site is steep and difficult. Sight distance is limited.

Directives for Pump Station #2:

1. Demonstrate the Pump Station is in conformance with the requirement of electric power failure plans (EPFPs) and operations, maintenance, and emergency response (OM&ER)

To preserve, enhance, restore, and conserve Vermont's natural resources, and protect human health, for the benefit of this and future generations.

Tom Marsh and Glenn Seward, Authorized Representatives
 Ascutney Mountain Sewer Pump Stations #1 & #2
 Request for Action
 June 19, 2014

plans. This may be accomplished by installing an emergency generator, providing adequate emergency storage, providing adequate bypass capacity, or by a combination of the three. If the emergency generator option is not chosen, the flow and volume of sewage received at the Pump Station once a power outage or other incident occurs, the amount of emergency storage, and the bypass capacity need to be determined. (Also see #5 below.) NPDES review criteria seek improvements to the reliability of this pump station. Notably, this pump station has already had one repair to add the emergency storage that is provided today. The original design did not provide for emergency storage due to the false assumption that if the power was out at Pump Station #2, it would also be out at Pump Station #1.

Guidance is available at these NPDES websites:

- a. <http://www.watershedmanagement.vt.gov/ww/om/WrittenGuidanceEmergencyAction-ElectricPowerFailure.pdf>
 - b. <http://www.watershedmanagement.vt.gov/ww/htm/opman.htm> Note: scroll down to OM&ER Plans
2. Confirm absence of lead/lag controls. If absent, replace control panel with lead/lag controls.
 3. Develop an inspection checklist for the pump station. Identify the frequency the Pump Station will be inspected by Town of Windsor staff and list items to be inspected and the maintenance items to be done during each inspection. A sample checklist is provided with this letter. Please include a check of the Mission Control system on the checklist and any steps necessary to ensure proper operation of the pump station. (This can also be used for pump station #1.)
 4. Pump and clean the wet well and emergency storage tank. Inspect all check and flapper valves for proper operation and seating and repair or replace as appropriate.
 5. Determine the status and origin of the pipe/penetration (4 inch diameter?) that enters/leaves the wet well to the north.
 6. Determine the wet well capacity and emergency storage capacity based on field measurements of the installation. A full capacity analysis and evaluation of this pump station is recommended that examines the capacity of each feature of the wet well. Submit calculations and report to Jeff Fehrs when completed.

Tom Marsh and Glenn Seward, Authorized Representatives
Ascutney Mountain Sewer Pump Stations #1 & #2
Request for Action
June 19, 2014

7. Locate and evaluate air release valves. Does air binding in the forcemain contribute to the pump station failure? Develop an operations and maintenance checklist for the air release valves.
8. Contact the permit specialist to determine if amendments are required for the selected alternative. This pump station is covered by an Act 250 permit, a WW permit, and the Windsor WWTF NPDES Discharge Permit #3-1253.

Funding Guidance for Pump Station #2:

The project has a place on the current Clean Water State Revolving Fund Priority List. If FED funding is desired, then the Town of Windsor is recommended to complete a loan application at its earliest convenience.

Pump Station #1 Observations:

1. The key is missing for the valve vault chamber and is therefore not accessible.
2. We did not observe an overflow pipe into the emergency storage. It appears that the wet well may be connected at the bottom to the wet well only, so that the emergency storage is contributing to the dose volume. Chapter 1 guidelines require a dose volume for 30 minutes of flow at ADD.
3. Pump 1 is reportedly too powerful and overwhelms Pump Station #2. A+E plans to design a VFD to throttle the flows. Currently, the flows would need to be manually throttled using the valves in the previously mentioned valve vault.
4. There is a timer installed in pump station #1 that precludes flow from being pumped during the day from 8am through 9pm. The operator reports that this is only in use during low flow periods in the summer as a means of odor control.
5. The odor problem may be due to the flow going septic due to the large dose volume.

Directives for Pump Station #1:

1. Prepare an Emergency Spill and Power Outage Plan. Demonstrate the Pump Station is in conformance with the requirement of electric power failure plans (EPFPs) and operations, maintenance, and emergency response (OM&ER) plans. This may be accomplished by installing an emergency generator, providing adequate emergency storage, providing adequate bypass capacity, or by a combination of the three. If the emergency generator option is not chosen, the flow and volume of sewage received at the Pump Station once a

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Tom Marsh and Glenn Seward, Authorized Representatives
 Ascutney Mountain Sewer Pump Stations #1 & #2
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 June 19, 2014

power outage or other incident occurs, the amount of emergency storage, and the bypass capacity need to be determined. (Also see #5 below.) NPDES review criteria seek improvements to the reliability of this pump station.

Guidance for the plans is available at these NPDES websites:

- a. <http://www.watershedmanagement.vt.gov/ww/om/WrittenGuidanceEmergencyAction-ElectricPowerFailure.pdf>
 - b. <http://www.watershedmanagement.vt.gov/ww/htm/opman.htm> Note: scroll down to OM&ER Plans
2. Confirm absence of lead/lag controls. If absent, replace control panel with lead/lag controls.
 3. Inspect and repair or replace check valve(s) as appropriate.
 4. Pump and clean the wet well and emergency storage tank. Check the flapper valve condition. Repair or replace if this valve does not seat.
 5. Determine the wet well capacity and emergency storage capacity based on field measurements of the installation. A full capacity analysis and evaluation of this pump station is recommended that examines the capacity of each feature of the wet well. Submit calculations and report to Jeff Fehrs when completed.
 6. Determine the current dose volume and if there is a reason why the dose volume cannot conform with the 30 minute dose volume timing advised in Chapter 1. Would the wet well need to be modified to have a 30 minute dose volume?
 7. Contact the permit specialist to determine if amendments are required for the selected alternative. This pump station is covered by an Act 250 permit, a WW permit, and possibly a future West Windsor NPDES permit.

Funding Guidance for Pump Station #1:

We understand that A+E would like to include this pump station work in the Brownsville Project. This work needs to be added to the Brownsville PER. FED has already sent A+E some guidance on the addition to the existing FED/ACCD funded project.

If the Pump Station #2 overflow issues are not successfully resolved, FED will not be able to make positive findings for NEPA on the Brownsville Sewer Extension. In order to help

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Tom Marsh and Glenn Seward, Authorized Representatives
Ascutney Mountain Sewer Pump Stations #1 & #2
Request for Action
June 19, 2014

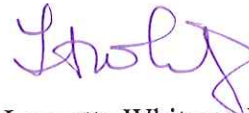
accommodate timelines with the grant limits, we can make conditional findings in NEPA and monitor the situation and improvements to be assured that the Brownsville project will have reliable conveyance in the Ascutney Mountain Sewer System.

Please do not hesitate to contact us if you have any questions or comments. We appreciate everyone's willingness to implement solutions to this problem.

Sincerely,



Jeff Fehrs, P.E.
NPDES Inspector
Watershed Management Division



Lynnette Whitney, P.E.
Pollution Control Design Chief
Facilities Engineering Division

Electronic copies:

Joe Duncan, P.E., A+E
Jeff MacDonald, P.E., F&O
Tom Joslin, Environmental Engineer, Water Infrastructure Financing Programs, VT-DEC-FED
Winslow Ladue, Manager, Water Infrastructure Financing Programs, VT-DEC-FED
Robert Pelosi, Construction Engineer, Water Infrastructure Financing Programs, VT-DEC-FED
Jeff Svec & Terry Shearer, Regional Engineers, VT-DEC-GWDWPD
Dan Mason, Enforcement Division, VT-DEC
Julia Butzler & Ernie Kelley, VT-DEC



INITIAL SEWER... 
SERVICE AREA

SEWER...  S 

FORCEMAIN...  FM 

MANHOLE... 

PUMP STATION... 

CLASS III WETLAND... 

[illegible]TOWN OF WEST
WINDSOR
VERMONT

BROWNSVILLE
SEWER SYSTEM
FACILITY PLANNING

ALTERNATIVE No. 1
ROUTE 44
PUMP STATION
OVERALL PLAN

DESIGNED KJC	PROJECT NO. 12062 FIGURE 7
DRAWN JEN	
CHECKED JJD	
DATE APRIL, 2013	