



Vermont Department of Environmental Conservation
EC7 Facilities Engineering Division

Agency of Natural Resources

1 National Life Drive
Main Building, 1st Floor
Montpelier, VT 05620-3510

Dominic Cloud, City Manager
Authorized Representative
City of St Albans
PO Box 867, 100 North Main St
St Albans, Vermont 05478-0867

May 7, 2014

**Re: Wastewater Treatment Facility Non-Phosphorus Refurbishment and
Adams Street and Russell Street Pump Station Replacements
Vermont/ USEPA Clean Water Revolving Loan Number RF1-170**

Categorical Exclusion from Detailed Environmental Review

Dear Mr Cloud:

The Department of Environmental Conservation has determined that the City's proposed **Wastewater Treatment Facility Non-Phosphorus Refurbishment and Adams Street and Russell Street Pump Station Replacements** project may be excluded from the detailed environmental review procedures that are required for projects that have significant environmental effects.

Please note that this Categorical Exclusion does **not** include diversion of stormwater from the **Huntington Street** wastewater pump station, as proposed in the facilities plan and environmental information documents. Those documents do not include information about the extent of the Huntington Street stormwater collection area, or definitive information about the method and location of stormwater diversion. Nearby impaired portions of the watersheds of Rugg Brook and Stevens Brook have stormwater TMDL's.

For now, in order to allow the remainder of the overall project to move forward, the proposed Huntington Street stormwater diversion will not be included in the approved facilities plan, and will not be eligible for clean water revolving loan construction funding. With addition of further information about the Huntington Street stormwater diversion, it may be possible to add that work to the approved facilities plan, meaning that it could become eligible for revolving loan construction funding, in the near future.

The Department's environmental review procedures require a **30 day public comment period** following the issuance of a Notice of Determination of Eligibility for Categorical Exclusion. If no public comments received during that period demonstrate that this Determination is in error, then the Categorical Exclusion exempting the project from detailed review will become effective.

Documents supporting a Categorical Exclusion are attached. Please keep the **attached documents available for public inspection** during a public comment period of 30 days. A full listing of the

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City of St Albans, Vermont
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documents that must be available for public inspection is attached. Please call, (802) 490-6227, if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Joslin". The signature is fluid and cursive, with the first name "Tom" and last name "Joslin" clearly distinguishable.

Thomas G. Joslin, PE
Environmental Engineer
Design Section

TGJ/tgj

Attachments

Dominic Cloud, City Manager, Authorized Representative
City of St Albans, Vermont
Wastewater Treatment Facility Non-Phosphorus Refurbishment and Adams Street and Russell Street
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Documents Attached for Categorical Exclusion Public Comment Period (30 days)

1. *"Notice of Determination of Eligibility for Categorical Exclusion"*
(Signed by Eric Blatt, PE, Director, Facilities Engineering Division.)
2. *"Evaluation of Eligibility for Categorical Exclusion"*
(Approved by Eric Blatt, PE, Director, Facilities Engineering Division.)

Additional Documents Needed for Categorical Exclusion Public Comment Period (30 days)

3. *"Environmental Review Procedures for Projects Funded Through the Vermont/EPA Revolving Loan Program"*, available online at:

http://www.anr.state.vt.us/dec/FED/design/docs/Environmental_Review_Procedures_for_VT-EPA_SRF.htm
4. **Categorical Exclusion** request letter, by City of St Albans, dated **April 3, 2014**.
5. **Environmental information document (EID)**, dated **April 3, 2014**, and prepared by **Aldrich + Elliott, PC**, Water Resource Engineers, of Essex Junction, Vermont.
6. **EID Addendum No. 1**, description of three collection system pump station upgrades, undated but received by VT-DEC Facilities Engineering Division on May 2, 2014, and prepared by **Aldrich + Elliott, PC**, Water Resource Engineers, of Essex Junction, Vermont.
7. **Facilities plan** titled *"City of St Albans, Vermont; Wastewater Treatment Facility, Preliminary Engineering Study"*, and dated **February 2014**, by **Aldrich + Elliott, PC**, Water Resource Engineers, of Essex Junction, Vermont.

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COPY LIST

Allen Robtoy, Director of Public Works, City of St Albans

Brian Willett, Chief Operator POTW, City of St Albans

Wayne Elliott, PE, Aldrich + Elliott, PC, Water Resource Engineers, Essex Junction, Vermont

Jennie Auster, PE, Aldrich + Elliott, PC, Water Resource Engineers, Essex Junction, Vermont

Rebecca Pfeiffer, CFM, Assistant NFIP Coordinator, Rivers Program, VT-DEC, Watershed Management Division, Essex

Staci Pomeroy, River Scientist, Rivers Program, VT-DEC, Watershed Management Division, Essex

Christopher Brunelle, EI, River Management Engineer, Rivers Program, VT-DEC, Watershed Management Division, Essex

Danielle Owczarski, Wetlands Ecologist, Wetlands Program, VT-DEC, Watershed Management Division

Tom Benoit, Environmental Analyst, Stormwater Program, VT-DEC, Watershed Management Division

Jim Pease, Environmental Scientist, Ecosystem Restoration Program, VT-DEC, Watershed Management Division

Karen Bates, Watershed Coordinator; Monitoring, Assessment and Planning Program; VT-DEC, Watershed Management Division, Essex

Ernie Kelley, Chief, Wastewater Program, VT-DEC, Watershed Management Division

Liz Dickson, Environmental Analyst, Wastewater Program, VT-DEC, Watershed Management Division

Chuck Schwer, Chief, Sites Management Section/ Brownfields Response Program; VT-DEC, Waste Management and Prevention Division

Everett Marshall, Data Manager, Wildlife Diversity Program, VT Dept of Fish & Wildlife

Scott Dillon, Survey Archeologist, Division for Historic Preservation, VT Dept of Housing and Community Development

Winslow Ladue, Chief, Financial Management Section, VT-DEC, Facilities Engineering Division

Lynnette Whitney, PE, Chief, Design Section, VT-DEC, Facilities Engineering Division



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Agency of Natural Resources

Notice of Determination of Eligibility for Categorical Exclusion

City of St Albans

Wastewater Treatment Facility Non-Phosphorus Refurbishment and
Adams Street and Russell Street Pump Station Replacements

Vermont/ USEPA Clean Water Revolving Loan Number RF1-170

May 7, 2014

In accordance with section VII of the Department's "*Environmental Review Procedures for Projects Funded Through the Vermont/ EPA Revolving Loan Program*", the **City of St Albans** has requested that its proposed **Wastewater Treatment Facility Non-Phosphorus Refurbishment and Adams Street and Russell Street Pump Station Replacements** project be evaluated for eligibility for a Categorical Exclusion from the detailed environmental review that is described in the Procedures and required for projects with significant environmental effects.

Consideration of the **City of St Albans** request for Categorical Exclusion included a review of the following documents:

Environmental information document (EID), dated **April 3, 2014**, and prepared by **Aldrich + Elliott, PC**, Water Resource Engineers, of Essex Junction, Vermont.

EID Addendum No. 1, description of three collection system pump station upgrades, undated but received by VT-DEC Facilities Engineering Division on May 2, 2014, and prepared by **Aldrich + Elliott, PC**, Water Resource Engineers, of Essex Junction, Vermont.

Facilities plan titled "*City of St Albans, Vermont; Wastewater Treatment Facility, Preliminary Engineering Study*", and dated **February 2014**, by **Aldrich + Elliott, PC**, Water Resource Engineers, of Essex Junction, Vermont.

Upon completion of its independent evaluation, the Department has determined that the proposed project, specifically excluding the Huntington Street pump station stormwater diversion described in the above documents, meets the criteria for issuance of a Categorical Exclusion.

Specifically, the project will not increase the permitted annual average flow (hydraulic) capacity of the existing City of St Albans wastewater treatment plant, and it will not increase permitted pounds of pollutants that may be discharged by that plant to lower Stevens Brook, near the head of St Albans Bay.

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Also, the project will not increase the design organic (equivalent population) treatment capacity of the St Albans wastewater treatment plant.

The proposed refurbishment of the treatment plant, and the replacements of the Adams Street and Russell Street pump stations, will not add a new permanent discharge of stormwater or treated wastewater to surface waters or groundwater.

Further, the overall project, excluding Huntington Street, does not involve (create) serious local or environmental issues, or meet any of the criteria that would result in denial of an Exclusion.

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

Dominic Cloud, City Manager
City of St Albans
PO Box 867, 100 North Main St
St Albans, Vermont 05478-0867

telephone (802) 524-1500 ext 253
d.cloud@stalbansvt.com

Tom Joslin, PE
Vermont Department of Environmental Conservation
Facilities Engineering Division
1 National Life Dr, 1 Main
Montpelier, Vermont 05620-3510

telephone (802) 490-6227
tom.joslin@state.vt.us

Jennie Auster, PE
Aldrich + Elliott, Water Resource Engineers
6 Market Place, Suite 2
Essex Junction, Vermont 05452

telephone (802) 879-7733
jauster@aeengineers.com

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, PE, Director
Facilities Engineering Division

May 7, 2014
Date

Department of Environmental Conservation
Vermont Agency of Natural Resources

TO: Eric Blatt, PE, Director, Facilities Engineering Division

FROM: Tom Joslin, PE, Environmental Engineer, Design Section, Facilities Engineering Division

SUBJECT: **City of St Albans**
Wastewater Treatment Facility Non-Phosphorus Refurbishment and
Adams Street and Russell Street Pump Station Replacements

Evaluation of Eligibility for Categorical Exclusion
from Detailed Environmental Review

DATE: May 7, 2014

A. Project Identification

Project Name: City of St Albans
Wastewater Treatment Facility Non-Phosphorus Refurbishment and
Adams Street and Russell Street Pump Station Replacements

Address: Dominic Cloud, City Manager
Authorized Representative
City of St Albans
PO Box 867, 100 North Main St
St Albans, Vermont 05478-0867

Project Location: Wastewater Treatment Facility, End of Rewes Drive, St Albans Town
Adams Street Pump Station, St Albans City
Russell Street Pump Station, St Albans City

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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 **City of St Albans** has requested that its proposed **Wastewater Treatment Facility Non-Phosphorus Refurbishment and Adams Street and Russell Street Pump Station Replacements** project be evaluated for eligibility for a Categorical Exclusion from the detailed environmental review that is described in the Procedures and required for projects with significant environmental effects.

The applicant's request, along with the following planning documents, has been reviewed, and our findings are summarized below:

Environmental information document (EID), dated **April 3, 2014**, and prepared by **Aldrich + Elliott, PC**, Water Resource Engineers, of Essex Junction, Vermont.

EID Addendum No. 1, description of three collection system pump station upgrades, undated but received by VT-DEC Facilities Engineering Division on May 2, 2014, and prepared by **Aldrich + Elliott, PC**, Water Resource Engineers, of Essex Junction, Vermont.

Facilities plan titled "*City of St Albans, Vermont; Wastewater Treatment Facility, Preliminary Engineering Study*", and dated **February 2014**, by **Aldrich + Elliott, PC**, Water Resource Engineers, of Essex Junction, Vermont.

1. Project Description

The City of St Albans is located in **Franklin County**, Vermont.

The proposed project will refurbish the existing City of St Albans wastewater treatment plant, which also serves portions of the Town of St Albans. The project specifically excludes treatment plant facilities dedicated to phosphorus removal: flocculation tank, tertiary filter building and chemical building.

The project will also replace two small sewage pump stations located in residential areas on the west side of the City of St Albans, on Adams Street and Russell Street, and will include purchase of a portable generator for the collection system pump stations.

The facilities planning and environmental information documents by the consulting engineer also describe upgrade of the Huntington Street pump station, by diversion of stormwater now entering that pump station. Those documents do not include information about the extent of the Huntington Street stormwater collection area, or about the method and location of stormwater diversion. Nearby impaired portions of the watersheds of Rugg Brook and Stevens Brook have stormwater TMDL's.

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At the treatment plant, the project will include upgrade of the existing headworks; upgrade of the existing septage receiving facility; upgrade of three existing primary clarifiers; replacement of three existing primary effluent pumps; replacement of existing trickling filter recirculation pumps; replacement of ten existing RBC (rotating biological contactor) units; upgrade of two existing secondary clarifiers; replacement of existing primary and secondary sludge pumps; new electrical room addition to filter building; replacement of disinfection mixer and effluent flow meter; refurbishment and upgrade of two anaerobic sludge digesters; new anaerobic sludge digester electrical room; replacement of one sludge storage recirculation pump; renovation of the existing Operations Building, including relocation of the motor control center to a new electrical room, and new PLC/SCADA plant monitoring and control system; upgrade of the process water pumps and distribution lines; new earth berm and stormwater pump station for flood protection of the treatment plant; and associated site work.

The project will also replace the existing Adams Street and Russell Street pump stations, with new submersible and above-ground pump stations, respectively, both in close proximity to the existing pump stations.

The project construction contract documents will contain standard requirements to limit hours of construction and to control noise, dust and discharges of stormwater runoff or pollutants during construction.

2. Justification for Categorical Exclusion

We have determined that the proposed project meets the criteria for issuance of a Categorical Exclusion.

Specifically, the project will not increase the **design hydraulic** capacity of the **St Albans** wastewater treatment plant by more than 20 percent, and it will not increase the design **organic** treatment capacity (**equivalent population served**) by more than 30 percent. In fact, the project is not intended to increase the hydraulic or organic capacity of the treatment plant at all.

The project will **not** create a **new permanent discharge** of treated wastewater to surface waters or groundwater, and there will be **no increase** of effluent **pollutant loadings** (pounds per day) permitted to be discharged from the St Albans treatment plant.

Stormwater from the site of the treatment plant currently discharges to Stevens Brook without treatment, either by sheet flow or by pipe. The proposed stormwater pump station on the treatment plant site is not expected to increase the impact of stormwater from the treatment plant site on Stevens Brook. Measures to contain spills of septage, dewatered sludge, etc, will be incorporated into the design of the treatment plant rehabilitation, to protect the water quality of that portion of Stevens Brook located immediately adjacent to and downstream from the treatment plant.

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The proposed stormwater pump station and earth berm extension will help to protect the treatment plant site from flooding, thereby improving treatment plant reliability and treatment performance, and safeguarding water quality at the plant outfall pipe discharge point, located in the Stevens Brook wetland at the head of St Albans Bay, several miles west of the treatment plant.

The project is not expected to adversely affect wetlands, wetlands buffer zones, floodplains, historic sites, archeological sites, habitats of threatened or endangered species, or other environmentally or culturally sensitive areas.

The western half of the treatment plant site is currently mapped, in the VT-ANR Natural Resources Atlas online mapping system, as a Class 2 wetland, but that area is currently occupied by treatment plant lawn or by treatment structures. The City will apply for all required wetlands permits, and will comply with all requirements needed to protect the adjacent mapped wetland area located outside the treatment plant perimeter fence.

The proposed replacements of the Adams Street and Russell Street pump stations will not create new discharges of stormwater to surface waters or groundwater.

This Categorical Exclusion will **not** include diversion of stormwater from the **Huntington Street** wastewater pump station, as proposed in the facilities plan and environmental information documents. Those documents do not include information about the extent of the Huntington Street stormwater collection area, or definitive information about the method and location of stormwater diversion. Nearby impaired portions of the watersheds of Rugg Brook and Stevens Brook have stormwater TMDL's.

For now, in order to allow the remainder of the overall project to move forward, the proposed Huntington Street stormwater diversion will not be included in the approved facilities plan, and will not be eligible for clean water revolving loan construction funding. With addition of further information about the Huntington Street stormwater diversion, it may be possible to add that work to the approved facilities plan, meaning that it could become eligible for revolving loan construction funding, in the near future.

The overall project, excluding Huntington Street, does not involve (create) serious local or environmental issues, or meet any of the criteria that would result in denial of an Exclusion.