

Vermont Department of Environmental Conservation

Agency of Natural Resources

WATER INVESTMENT DIVISION National Life Building, Davis 3 1 National Life Drive Montpelier, VT 05620-3510 FAX: (802)828-1552

Ms. Nancy Robinson, Town Clerk Authorized Representative Town of Bridgewater 7335 US Rte 4 Bridgewater, VT 05034

October 16, 2020

Expiration Date: October 16, 2025

Re: Bridgewater WWTF Refurbishment Project
Vermont/ USEPA Clean Water Revolving Loan Number RF1-216

Notice of Intent to Issue a Finding of No Significant Impact

Dear Nancy Robinson:

The Department of Environmental Conservation intends to issue a Finding of No Significant Impact (FNSI) for the Bridgewater WWTF Refurbishment Project.

The project is a Capital Improvement project for the Town's Wastewater Treatment Facility (WWTF) and collection system. In general the project will include: WWTF refurbishments (replacement of existing components, foundation repairs, electrical improvements, replacement of the roof and siding); rehabilitation of an existing municipal pump station located within the Route 4 ROW; sewer main replacement (370 ft); cured in place pipe repair (80 ft) and appurtenant work.

The project consisting of elimination of infiltration into the collection system by replacing affected sewer mains and rehabilitation of the WWTF to maintain water quality has several positive environmental and human health impacts by maintaining overall plant efficiency and discharge parameters.

The construction work related to the refurbishment and repair project is in the Flood Insurance Rate Map (FIRM), mapped 100-year floodplain of the Ottauquechee River.

This project may otherwise have been eligible for Categorical Exclusion from detailed environmental review. Additionally, the direct and indirect environmental effects of the project are still not significant enough to necessitate an Environmental Impact Statement (EIS). The Water Investment Division issued a Letter of Acceptance for the Preliminary Engineering Report on January 23, 2020.

Nancy Robinson, Authorized Representative, Town of Bridgewater Bridgewater WWTF Refurbishment Project Finding of No Significant Impact October 16, 2020

The Department's environmental review procedures require a 30-day public comment period following the issuance of a Notice of Intent to Issue a Finding of No Significant Impact, to begin upon the signature of this letter. The town of Bridgewater held a FNSI hearing during its July 28, 2020 select-board meeting. No public comments were received during that meeting.

Copies of documents supporting a Finding of No Significant Impact are enclosed. Please keep copies of the enclosed documents, along with any pertinent reports by your consulting engineers, available for public inspection during a public comment period of 30 days. A full listing of the documents that must be available for public inspection is attached. Please call, 802-522-5564, if you have any questions or concerns.

Sincerely,

hugo martínez cazón, p.e.

Pollution Control Design Engineer

Clean Water State Revolving Fund

Nancy Robinson, Authorized Representative, Town of Bridgewater Bridgewater WWTF Refurbishment Project Finding of No Significant Impact October 16, 2020 Enclosures

Documents Posted for Finding of No Significant Impact Public Comment Period (30 days)

- 1. Notice of Intent to Issue a Finding of No Significant Impact (Signed by Eric Blatt, P.E., Director, Water Investment Division, enclosed.)
- 2. Evaluation of Eligibility for Finding of No Significant Impact (Approved by Eric Blatt, P.E., Director of Engineering, Water Investment Division, enclosed.)
- 3. State Environmental Review Procedures for Projects Funded Through the Vermont/ EPA Revolving Loan Program, http://dec.vermont.gov/facilities-engineering/water-financing/srf/environmental-review

Additional Documents Needed for Finding of No Significant Impact Public Comment Period (30 days)

- 4. Environmental Information Document titled "Environmental Report and Environmental Information Document," and dated June 2019, by Otter Creek Engineering. https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=177164&DVID=0 App. E (p 268).
- 5. Preliminary Engineering Report entitled "Town of Bridgewater Wastewater Treatment Facility and Collection System Preliminary Engineering Report," and dated June 2019, by Craig Jewett, PE. https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=182981&DVID=0
- 6. Project Review Sheet dated June 18, 2020. https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=185355&DVID=0

COPY LIST

Amy Polaczyk, and Jamie Bates Wastewater Program, VT-DEC Terry Shearer, and Jeff Svec Regional Engineer, VT-DEC, DWGPD Scott Dillon, Division for Historic Preservation, ACCD Chris Hayes, Chief Operator, Town of Bridgewater Craig Jewett, PE, Otter Creek Engineering William H. Kerbin Jr., Municipal Manager, Town of Woodstock

Town of Bridgewater Bridgewater WWTF Refurbishment Project Notice of Intent to Issue a Finding of No Significant Impact October 16, 2020

> Department of Environmental Conservation Water Investment Division 1 National Life Drive, Davis 3 Montpelier, VT 05620

> > 802-522-5564

Notice of Intent to Issue a Finding of No Significant Impact

Town of Bridgewater Bridgewater WWTF Refurbishment Project

Vermont/ USEPA Clean Water Revolving Loan Number: RF1-216

In accordance with section VII of the Department's "Environmental Review Procedures for Projects Funded Through the Vermont/EPA Revolving Loan Program," the Department of Environmental Conservation intends to issue a Finding of No Significant Impact (FNSI) for the proposed Bridgewater WWTF Refurbishment Project. This project involves: Implementation of a number of deferred maintenance and repairs/improvements to the building structure and system components that have reached the end of their useful life, with the repair of some sewer lines in the right of way.

Under the Procedure, the project is ineligible for Categorical Exclusion (CATEX) from detailed environmental review. The project involves open trenching in the right of way, and the potential for the work to be in the floodplain, and therefore exceeds the threshold for CATEX.

Also, the direct and indirect environmental effects of the project are not significant enough to necessitate an Environmental Impact Statement (EIS) under the Department's environmental review procedures. The project will not increase the current permitted flow capacity of the treatment plant, and the project will not include sewer extensions.

Consideration of the FNSI included a review of the following documents:

• **Environmental Information Document** (EID) signed June 2019, by Otter Creek Engineering, of Rutland, Vermont.

Town of Bridgewater Bridgewater WWTF Refurbishment Project Notice of Intent to Issue a Finding of No Significant Impact October 16, 2020

Further information on the project and this Notice of Intent is available for inspection by contacting:

Nancy Robinson, Town Clerk Town of Bridgewater 7335 US Rte 4 Bridgewater, VT 05034

twnbridg@comcast.net

tel. 802-672-3334

hugo martínez cazón, PE
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1 National Life Drive, Main 2
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tel. 802-522-5564 hugo.martinez.cazon@Vermont.gov

Craig Jewett, PE
Otter Creek Engineering
110 Merchants Row 4th Floor Suite 15
Rutland, VT 05701

tel. 802-747-4820 jewett@ottercrk.com

Note: Due to covid-19 inspection of physical documents may be limited.

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 of Engineering

Water Investment Division

October 16, 2020

Date

Department of Environmental Conservation Vermont Agency of Natural Resources



Vermont Department of Environmental Conservation

Agency of Natural Resources

TO: Eric Blatt, P.E., Director of Engineering, Water Investment Division

FROM: hugo martínez cazón, PE,

Pollution Control Design Engineer, Water Investment Division

SUBJECT: Town of Bridgewater

Bridgewater WWTF Refurbishment Project Project

Evaluation of Eligibility for Finding of No Significant Impact

DATE: Friday, October 16, 2020

A. <u>Project Identification</u>

Project Name: Town of Bridgewater

Bridgewater WWTF Refurbishment Project

Address: Nancy Robinson, Authorized Representative

Town of Bridgewater

7335 US Rte 4

Bridgewater, VT 05034

Project Location: Town of Bridgewater, Vermont

Sewer work along the Rt 4 right of way from the Woolen Mill Drive

towards the intersection with N. Bridgewater Rd, reaching the Gold Coast Road, in the Town of Bridgewater, and repair onsite at the wastewater treatment plant and pump station. The project is to take place in the

Ottauquechee River associated watershed.

Vermont/ USEPA Clean Water Revolving Loan Number: RF1-216

Nancy Robinson, Authorized Representative, Town of Bridgewater Evaluation of Eligibility for Finding of No Significant Impact Bridgewater WWTF Refurbishment Project Vermont/ USEPA Clean Water Loan Number RF1-216 Friday, October 16, 2020

B. Summary of Environmental Review

The Department of Environmental Conservation, Water Investment Division, has reviewed this proposed project in accordance with the Department's State <u>Environmental Review Procedures for Projects Funded Through the Vermont/ EPA Revolving Loan Program</u>.

The Department has reviewed the following planning documents:

- Environmental Information Document titled "Environmental Report and Environmental Information Document," and June 2019, by Otter Creek Engineering.
- Preliminary Engineering Report entitled "Town of Bridgewater Wastewater Treatment Facility and Collection System Preliminary Engineering Report," and dated June 2019 by Craig Jewett, PE.

A Finding of No Significant Impact (FNSI) is the appropriate environmental review response for this project if the issues presented can be resolved with mitigation or permits. This project is not eligible for Categorical Exclusion from detailed environmental review due to potential impacts from the open trench excavation in the roadways potentially impacting the floodplain of the Ottauquechee River. Also, the project's direct and indirect environmental effects do not necessitate issuance of an Environmental Impact Statement (EIS), consistent with the criteria as described in section XI of the Department's environmental review procedures.

1. <u>Project Description</u>

The Town of Bridgewater is located in Windsor County, Vermont in the Ottauquechee major watershed.

The project will: replace equipment and repair building elements at the Town of Bridgewater WWTF, which is located across the town line, within the Town of Woodstock; refurbish a pump station which is at the end of its useful life; slip line segments of the sewer to eliminate the two identified infiltration/inflow areas that are contributing additional non-wastewater flows to the collection system, to preserve the WWTF's effective treatment capacity. The project will preserve the collection and treatment system effectiveness to below regulatory levels.

The WWTF was designed for a hydraulic treatment capacity of 40,000 gallons per day; however, the system's actual treatment capacity is approximately 13,400 gallons per day, based on nitrogen limitations related to the Long Island Sound TMDL. A number of deferred maintenance and operational considerations require repairs/improvements to the building structure and to the system components that have reached the end of their useful life. The WWTF is on the edge of the mapped floodplain and building rehabilitation support efforts may potentially impact the floodplain.

Nancy Robinson, Authorized Representative, Town of Bridgewater Evaluation of Eligibility for Finding of No Significant Impact Bridgewater WWTF Refurbishment Project Vermont/ USEPA Clean Water Loan Number RF1-216 Friday, October 16, 2020

WWTF refurbishment will include: repairs of the concrete wall that separates the RBC and the Secondary Clarifier and repair of foundation and CMU cracks; replacement of the RBC motor, drive shaft, lift chain and scoops; replacement of all corroded electrical components within the RBC room; pressure washing and painting of all steel beams; replacement of truss and roof shingles; addition of passive ventilation to the RBC room to improve air flow and limit the corrosive environment. External building repair will include replacement of rotted clapboard and sanding and/or repainting where appropriate.

The Pump Station serving the system has reached the end of its useful life, is unsafe, and has a high associated operational cost. The Pump Station structure, located within the Route 4 ROW, will require rehabilitation to reduce current and future operational and maintenance cost. Currently the Pump Station receives approximately 3,500 GPD (including infiltration). The two 3-HP Hydromatic grinder pumps can meet 35 GPM at 47 feet of TDH. Overall, the Pump Station is in poor working condition and in need of improvement. The project recommendation is that the entire Pump Station be rehabilitated/rebuilt.

A Pump Station telemetry system to coordinate with the control and monitoring system in the WWTF is recommended to reduce overall Operation and Maintenance cost and to provide the system operator with "real time" access to alarm conditions in the system. This could assist in managing the perennial issues with clogging with rags and waste.

Repairs to the Collection System are needed as two identified infiltration/inflow areas are contributing additional non-wastewater flows that affect the WWTF's effective treatment capacity. One of the infiltration/inflow areas is located directly below a stream that crosses VT Route 4. Elimination of infiltration will lower daily flows, pumping and electrical costs. During tropical storm Irene, a portion of the Collection System which drains to the Pump Station experienced flooding and caused sewer backups at two residences, leading to the installation of two residential check-valves. Eighty linear feet of cured in place pipe repair will address a leaky sewer main.

The 2" force main is PVC and has no reported issues, it is now however 42 years old.

This project involves impacts related to the open cut replacement of a 305 linear foot reach of sewer pipe and concurrent replacement of an existing structural slab over the pipe within the VT Route 4 right-of-way.

There are no plans for expansion or large amounts of additional flows added to the system.

This work is expected to be constructed with a Clean Water State Revolving Fund (CWSRF) loan.

Nancy Robinson, Authorized Representative, Town of Bridgewater Evaluation of Eligibility for Finding of No Significant Impact Bridgewater WWTF Refurbishment Project Vermont/ USEPA Clean Water Loan Number RF1-216 Friday, October 16, 2020

Eligibility for clean water revolving loan (CWSRF) construction funding will be limited to the eligible clean water work as detailed in the Preliminary Engineering Report and to physical areas cleared through this environmental review process.

The 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. <u>Justification for Finding of No Significant Impact</u>

We have determined that the proposed project meets the criteria for issuance of a Finding of No Significant Impact.

The project is in the mapped 100-year floodplain. However, the finished floor elevation of the 1977 design drawings is two feet higher than the approximate FIRM 100-year flood elevation, therefore the dry flood proofing mitigation meets the requirements of the executive order on floodplains.

Otherwise, this project may have been eligible for Categorical Exclusion from detailed environmental review. Additionally, the direct and indirect environmental effects of the project are still not significant enough to necessitate an Environmental Impact Statement (EIS).

Specifically, the project will not increase the design hydraulic capacity of the 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. The project does not include sewer extensions.

The project will not create a new permanent discharge of stormwater or 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 associated wastewater treatment plant.

A public hearing was held on July 28, 2020 at the Town of Bridgewater as part of this FNSI process and no public comments were received.