



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

Mr. Greg Maggard, Town Manager
Authorized Representative
Town of Proctor
45 Main Street
Proctor, VT 05765

February 24, 2021
Expiration Date: February 24, 2026

**Re: Willow Street Pump Station Project
Vermont/ USEPA Clean Water Revolving Loan Number RF1-241**

Notice of Intent to Issue a Finding of No Significant Impact

Dear Mr. Maggard:

The Department of Environmental Conservation intends to issue a Finding of No Significant Impact (FNSI) for the *Willow Street Pump Station Project, in Proctor*.

The Department of Environmental Conservation has reviewed these documents:

- Environmental Information Document, dated October 30, 2020, by Aldrich + Elliott Engineering
- Preliminary Engineering Report, submitted dated October 2020, by Aldrich + Elliott Engineering

The Water Investment Division (WID) issued its request for review to Division for Historic Preservation (DHP) and to Stockbridge-Munsee Mohican Tribal Historic Preservation, in its letter dated July 7, 2020. No comments were received in response.

The project has positive environmental impacts consisting of the elimination of infiltration, and upgrade of treatment infrastructure. The Town of Proctor is under a Section 1272 Order issued February 16, 2018 by the Watershed Management Division Wastewater Program, for the Wastewater Treatment Facility, regarding Discharge Permit No. 3-1298.

The Willow Street sewer service area report identified existing deficiencies and needs. In the spring of 2019, due to excessive hydraulic loading, the pump station was unable to keep up with incoming flow. The pumps were operated constantly for multiple days, beyond their designed usage, and flow had to be pumped from the upstream manhole to prevent a sewage backup. Following an extended period of pumping and trucking, the Town was forced to overflow excess flow to the Otter Creek in order to maintain service in a practical manner.

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Willow Street Pump Station
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The project will not increase capacity or expand the service area, the project is intended to address observed points of infiltration/inflow to the system. Project will include various trenchless and replacement strategies to address the observed points of infiltration/inflow and will include:

- Replacement of 300 LF 6" VC sewer with 8" PVC sewer via jack and bore under an existing railway.
- Replacement of 860 LF existing 6" VC sewer with 8" PVC by trench excavation.
- Replacement of 3 failing manhole structures with new precast concrete structures.
- Replacement of 16 deficient manhole covers.
- Cementitious lining/patching in 6 manhole structures.

The collection system repair aspect of the project additionally involves the potential to transect impacted areas of subsurface soils and groundwater, in the vicinity of a listed Vermont hazardous waste site, on Pleasant Street due to failure of a 1,000-gallon underground storage tank holding heating oil. Another area of concern is a suspected former gas station potentially located along the North Street stretch of the proposed project that may be encountered. Any excavation in that vicinity could potentially encounter a pre-certification underground storage tank and appurtenances in the proximity, along Gorham Bridge Road. The intent of this project is to address original failing/failed infrastructure to decrease the quantity of extraneous water received by the system.

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).

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. If no public comments received during that period demonstrate that this Notice of Intent is in error, then the Finding of No Significant Impact will become effective.

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. There will be a public hearing on the FONSI at a date to be determined. A full listing of the documents that must be available for public inspection is attached. Please call, Hugo Martínez Cazón at 802 522-5564, if you have any questions or concerns.

Sincerely,

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

Greg Maggard, Authorized Representative, Town of Proctor
Willow Street Pump Station
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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 of Engineering, 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,
<https://dec.vermont.gov/water-investment/water-financing/srf/environmental-review>

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

4. Environmental Information Document (Appendix E) to address the infiltration and inflow to the Willow Street pump station service area of the Town of Proctor; Preliminary Engineering Report entitled "Town of Proctor Willow Street PS Preliminary Engineering Report," dated October 2020 by Aldritch and Elliott.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=187745&DVID=0>

COPY LIST

Wayne Elliott, PE, Aldrich & Elliott Engineering
Thomas Brown, CWSRF Program Lead, VT-DEC-WID
Jeff Fehrs, PE, Supervisor, Design and Construction Engineering Section, VT-DEC-WID
Amy Polaczyk, Wastewater Management Program, VT-DEC
Jon Harries, PE, USDA Rural Development

Department of Environmental Conservation
Water Investment Division
1 National Life Drive, Main 2
Montpelier, VT 05620

802 522-5564

Notice of Intent to Issue a Finding of No Significant Impact

**Town of Proctor
Willow Street Pump Station Project**

Vermont/ USEPA Clean Water Revolving Loan Number: RF1-241-2.0

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 **Willow Street Pump Station Project**. This project involves repairs/improvements of manholes that have reached the end of their useful life, and replacement of damaged sewer lines.

Under the Procedure, the project is ineligible for Categorical Exclusion (CATEX) from detailed environmental review. The project involves excavation in the right of way to repair infiltration and replace sewers including at two areas of suspected past subsurface hazardous releases, 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 FONSI included a review of the following documents:

1. **Environmental Information Document** (Appendix E) titled Environmental Report, "Willow Street Pump Station, RF1-241" Preliminary Engineering Report, and dated 10/30/2020, by Aldrich and Elliott Engineering.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=187745&DVID=0>

**Town of Proctor
Willow Street Pump Station
Notice of Intent to Issue a Finding of No Significant Impact
February 24, 2021**

Further information on the project and this Notice of Intent is available for inspection at the following locations:

Greg Maggard, Town Manager
Town of Proctor
45 Main Street
Proctor, Vermont 05765

tel. 802.802.459.3333
manager@proctorvermont.com

hugo martínez cazón, p.e.
Vermont Department of Environmental Conservation
Water Investment Division
1 National Life Drive, Davis 3
Montpelier, VT 05620-3510

tel. 802.522-5564
hugo.martinez.cazon@vermont.gov

(Note: National Life requires photo identification to obtain an access badge for entry.)

Wayne Elliott, P.E.
Aldrich & Elliott Engineering
6 Market Place, Suite 2
Essex Junction, Vermont 05452

tel. 802.879.7733 x103
welliott@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, P.E., Director of Engineering
Water Investment Division

Date

Department of Environmental Conservation
Vermont Agency of Natural Resources

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

FROM: hugo martínez cazón, p.e.,
Pollution Control Design Engineer, Water Investment Division

SUBJECT: Town of Proctor
Willow Street Pump Station Project

Evaluation of Eligibility for Finding of No Significant Impact

DATE: 2/24/21

A. Project Identification

Project Name: Town of Proctor
Willow Street Pump Station Project

Address: Greg Maggard, Town Manager
Town of Proctor
45 Main Street
Proctor, Vermont 05765

Project Location: Town of Proctor, Vermont
Otter Creek Watershed
Willow Street Pump Station Service Area

Vermont/ USEPA Clean Water Revolving Loan Number: **RF1-241**

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 Environmental Review Procedures for Projects Funded Through the Vermont/ EPA Revolving Loan Program.

**Greg Maggard, Town Manager, Authorized Representative, Town of Proctor Evaluation of
Eligibility for Finding of No Significant Impact
Willow Street Pump Station Project
Vermont/ USEPA Clean Water Loan Number RF1-241
February 18, 2021**

The Department has reviewed the following planning documents:

- Environmental Information Document (Appendix E) titled Environmental Report, “Willow Street Pump Station, RF1-241” Preliminary Engineering Report, and dated 10/30/2020, by Aldrich and Elliott Engineering.
 - <https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=187745&DVID=0>
- Preliminary Engineering Report, and dated 10/30/2020, by Aldrich and Elliott Engineering.

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 as it transects impacted areas of subsurface soils and groundwater, in the Otter Creek River watershed. 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. Project Description

The Town of Proctor is located in Rutland County, Vermont in the Otter Creek watershed of the Lake Champlain basin.

This project involves:

- Installation of cross country 8” sewer line via jack and bore underneath the railway.
- Project will address points of infiltration/inflow and will include:
- Replacement of 860 LF existing 6" VC sewer with 8" PVC by trench excavation.
- Replacement of 3 failing manhole structures with new precast concrete structures.
- Replacement of 16 deficient manhole covers.
- Cementitious lining/patching in 6 manhole structures.
- Transecting potentially impacted areas of subsurface soils and groundwater

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

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.

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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. Justification for Finding of No Significant Impact

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

This project involves excavation potentially transecting impacted areas of subsurface soils and groundwater discharge and stormwater runoff to the Otter Creek River.

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 permitted to be discharged from associated wastewater treatment plant.

There will be a public hearing on the FONSI at a date to be determined.