



Vermont Department of Environmental Conservation

EC7 Water Investment Division

1 National Life Drive, Davis 3
Montpelier, VT 05620

Agency of Natural Resources

Jennifer St Thomas, Board President
Authorized Representative
Bull Run Water System, Inc.
77 Okemo Ridge Road
Ludlow, VT, 05149

5/14/2026

Expiration Date: 5/14/2031

**Re: Water Treatment System and Water Storage Tank Improvements Project
Vermont/ USEPA Clean Water Revolving Loan Numbers RF3-431 and RF3-418
Categorical Exclusion Supplement**

Dear Jennifer St Thomas:

In accordance with section VII of the Department's *Vermont/EPA Drinking Water State Revolving Fund Loan Program*, the Department of Environmental Conservation intends to supplement the Categorical Exclusion (CATEX) for the proposed Water Storage Tank Improvements project. This project consists of the replacement of the existing 40,000-gallon water storage tank with a 100,000-gallon water storage tank, and the construction of a new water treatment building. The addition of PFAS removal has been added to the design of the new water treatment building after the original CATEX was issued. There has additionally been a change to the project footprint.

A Categorical Exclusion (CATEX) was issued for this project on January 25, 2021, and expired on January 25, 2026. In order to proceed with future loan agreements, the project and environmental conditions were reviewed to renew the environmental determination. Upon review of the existing Categorical Exclusion documentation, it was determined that a Categorical Exclusion is the appropriate environmental review response for this project, and the project can proceed without the need for any further environmental review. This project does not involve serious local or environmental issues or meet any of the criteria that would result in denial of a Categorical Exclusion. The project's direct and indirect environmental effects do not meet criteria for issuance of an Environmental Impact Statement (EIS), as described in section XI of the Department's environmental review procedures.

Bull Run Water System, Inc.
Water Storage Tank Improvements
Categorical Exclusion Supplement
5/14/2026

The Water Investment Division has completed its review of the following documents which support a supplement of the Categorical Exclusion:

1. Environmental Information Document titled "*Environmental Report and Environmental Information Document*," and dated November 11, 2020, by Robert M. Clark, PE.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=219971&DVID=0>
2. Notice of Determination of Eligibility for Categorical Exclusion, dated January 25, 2021, by Eric Blatt, PE.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=188032&DVID=0>
3. **Section 106 Project Review Form** (PRF) dated May 14, 2026, by the State Historic Preservation Office.
<https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=219991&DVID=0>
4. Original Plan Set, titled "*Bull Run Water System Treatment System Improvements*," by Otter Creek Engineering. <https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=219977&DVID=0>
5. Current Plan Set "*Bull Run Water System Treatment System Improvements*," and dated 2025, by Otter Creek Engineering. <https://anrweb.vt.gov/DEC/IronPIG/DownloadFile.aspx?DID=219922&DVID=0>

This Categorical Exclusion supplement, along with future approval of construction contract documents, is needed to qualify Bull Run Water System, Inc. for DWSRF construction funding.

Please call Chloe Hulsizer at (802) 522-3562 if you have any questions regarding this Categorical Exclusion supplement.

Sincerely,

Signed by:

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Chloe Hulsizer, Environmental Analyst IV
Water Investment Division

Signed by:

C13D237CC28247C... 5/14/2026

Emily Bird, Director
Water Investment Division

Bull Run Water System, Inc.
Water Storage Tank Improvements
Categorical Exclusion Supplement
5/14/2026

Electronic Copies:

Robert Clark, PE, Otter Creek Engineering

Amy Galford, DWSRF Program Lead

Don Haddox, Design and Construction Engineering Program Manager, VT-DEC-WID

Lynnette Claudon, PE, VT-DEC Water Investment Division

Allison Murphy, PE, Construction Engineer, VT-DEC-WID

Initial


5/14/2026