

AGENCY OF NATURAL RESOURCES
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
WASTEWATER MANAGEMENT DIVISION
103 SOUTH MAIN STREET
WATERBURY, VERMONT 05671-0405

*Corrected Page 5/20/04 (NPDES No.)

FACT SHEET
(April 2004)

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT TO
DISCHARGE TO WATERS OF THE UNITED STATES

NPDES NO: VT0100064*
FILE NO: 13-02
PERMIT NO: 3-1242
PROJECT ID NO: NS97-0153

NAME AND ADDRESS OF APPLICANT:

Town of Brattleboro
211 Fairground Road
Brattleboro, VT 05301

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:

Brattleboro Wastewater Treatment Facility
340 Riverside Drive
Brattleboro, Vermont

RECEIVING WATER: Connecticut River

CLASSIFICATION: Class B with a waste management zone. Class B waters are suitable for bathing and recreation, irrigation and agricultural uses; good fish habitat; good aesthetic value; acceptable for public water supply with filtration and disinfection. A waste management zone is a specific reach of Class B waters designated by a permit to accept the discharge of properly treated wastes that prior to treatment contained organisms pathogenic to human beings.

I. Proposed Action, Type of Facility, and Discharge Location

The above named applicant applied on January 2, 2004 to the Vermont Department of Environmental Conservation for renewal of the permit to discharge into the designated receiving water. At this time the Department has made a tentative decision to issue a renewal of the previously issued discharge permit. The facility is engaged in the treatment of municipal wastewater. The discharge is from the outfall of the Town of Brattleboro Wastewater Treatment Facility to the Connecticut River.

II. Description of Discharge

III. Limitations and Conditions

The effluent limitations of the permit, the monitoring requirements, and any implementation schedule (if required), may be found on the following pages of the permit:

Effluent Limitations: Page 2 of 18
Monitoring Requirements: Pages 3 through 6 of 18

IV. Permit Basis and Explanation of Effluent Limitation Derivation

The Town of Brattleboro owns and operates the Brattleboro Wastewater Treatment Facility which provides secondary treatment and disinfection of municipal wastewater. The facility consists of primary clarification followed by rotating biological contactors (RBCs) and secondary clarifiers to achieve secondary treatment and liquid chlorine to provide disinfection. Sludge is disposed of by either land application (out of state) or is trucked to a landfill.

Flow - The effluent flow limitation remains at 3.0 mgd, annual average, representing the facility's design flow. The facility maintains a continuous discharge.

Biochemical Oxygen Demand (BOD₅) - The effluent limitations for biochemical oxygen demand remain unchanged from the previous permit. The monthly average (30 mg/l) and weekly average (45 mg/l) reflect the minimum level of effluent quality specified for secondary treatment in 40 CFR Part 133.102. The daily maximum limit (50 mg/l) is the Department standard applied to all such discharges pursuant to 13.4 c. of the Vermont Water Pollution Control Permit Regulations. Mass limits (751 lbs/day, monthly average and 1126 lbs/day, weekly average) are derived by multiplying the concentration limits by the permitted flow. The BOD monitoring requirement has been changed from twice monthly to weekly in the summer months (April through October) and is unchanged at twice monthly during the winter months. This is consistent with similarly sized facilities.

Total Suspended Solids (TSS) - The effluent limitations for total suspended solids remain unchanged from the previous permit. The monthly average (30 mg/l) and weekly average (45 mg/l) reflect the minimum level of effluent quality specified for secondary treatment in 40 CFR Part 133.102. The daily maximum limit (50 mg/l) is the Department standard applied to all such discharges pursuant to 13.4 c. of the Vermont Water Pollution Control Permit Regulations. Mass limits (751 lbs/day, monthly average and 1126 lbs/day, weekly average) are derived by multiplying the concentration limits by the permitted flow. The TSS monitoring requirement has been changed from twice monthly to weekly in the summer months (April through October) and is unchanged at twice monthly during the winter months. This is consistent with similarly sized facilities.

pH - The pH limitation remains at 6.5 - 8.5 Standard Units as specified in Section 3-01 B.9. in the Vermont Water Quality Standards, effective July 2, 2000. Monitoring remains at daily.

Settleable Solids - The limitation of 1.0 ml/l instantaneous maximum and daily monitoring remain unchanged from the previous permit. This numeric limit was established in support of the narrative standard in Section 3-01 B.5. of the Vermont Water Quality Standards, effective July 2, 2000.

E. coli Bacteria - The E. coli limitation is 77/100 ml as specified in Section 3-04 B.3., Vermont Water Quality Standards, effective July 2, 2000. The monitoring frequency is proposed to be changed from twice monthly to weekly in the summer months (April through October) and remains at twice monthly during the winter months. This is consistent with similarly sized facilities.

Total Residual Chlorine (TRC) - The TRC limits of 1.0 mg/l, weekly average, and 2.0 mg/l, instantaneous maximum, are based on meeting the water quality acute and chronic chlorine criteria (0.019 mg/l and 0.011 mg/l respectively) in the Vermont Water Quality Standards, effective July 2, 2000 for the protection of aquatic biota. Daily monitoring is required.

Toxicity Testing - 40 CFR Part 122.44(d)(1) requires the Department to assess whether the discharge causes, has the reasonable potential to cause, or contribute to an excursion above any narrative or numeric water quality criteria. In addition, Part 122.21 requires all publicly owned treatment works (POTW) with flows greater than or equal to one mgd to complete a minimum of four WET tests.

Based on the results of the Whole Effluent Toxicity and/or toxic pollutant testing conducted by the Department in 1994 and by the Town in 2000, 2003, and 2004 this discharge did not have an instream toxic impact. The proposed permit includes (Part I.C.) four one-species acute WET tests during the term of the permit to ensure compliance with Part 122.21 at the time of permit renewal.

Additional Monitoring - For all facilities with a design flow of greater than 0.1 mgd, 40 CFR § 122.21(j), Application for a permit, requires the submittal of monitoring data for those parameters identified in Condition I.G.2. of the permit.

Samples must be collected once annually during various seasons (ie. include each of the four quarters during the permit period) and the results submitted by December 31 of each year.

Engineering Evaluation and Report - Since this wastewater treatment facility has reached its 20 year design life, an engineering evaluation condition was included in the permit (Part I.D.). This condition requires the permittee to conduct an in-depth engineering inspection and report of the treatment facility to identify currently needed repairs as well as equipment, processes, and other possible deficiencies which may adversely affect effluent quality or the proper operation of the treatment facility. This report must be submitted to the Department by December 31, 2005.

Waste Management Zone - As defined under 10 V.S.A. §1251(16), a waste management zone is "a specific reach of Class B waters designated by a permit to accept the discharge of properly treated wastes that prior to treatment contained organisms pathogenic to human beings. Throughout the receiving waters, water quality criteria must be achieved but increased health risks exist due to the authorized discharge".

The proposed permit retains the existing waste management zone (WMZ) that extends downstream from the outfall for approximately one mile in the Connecticut River.

Electric Power Failure - Within 30 days of the effective date of the permit, the permittee must submit to the Department, updated documentation addressing how the discharge will be handled in the event of an electric power outage. The effluent must receive a minimum of primary treatment plus disinfection.

V. Procedures for Formulation of Final Determinations

The public comment period for receiving comments on this draft permit is from April 12 through May 12, 2004 during which time interested persons may submit their written views on the draft permit. All written comments received by 4:30 PM on May 12, 2004 will be retained by the Department and considered in the formulation of the final determination to issue, deny or modify the draft permit. The period of comment may be extended at the discretion of the Department.

Written comments should be sent to:

Vermont Agency of Natural Resources
Department of Environmental Conservation
Wastewater Management Division - Sewing Building
103 South Main Street
Waterbury, VT 05671-0405

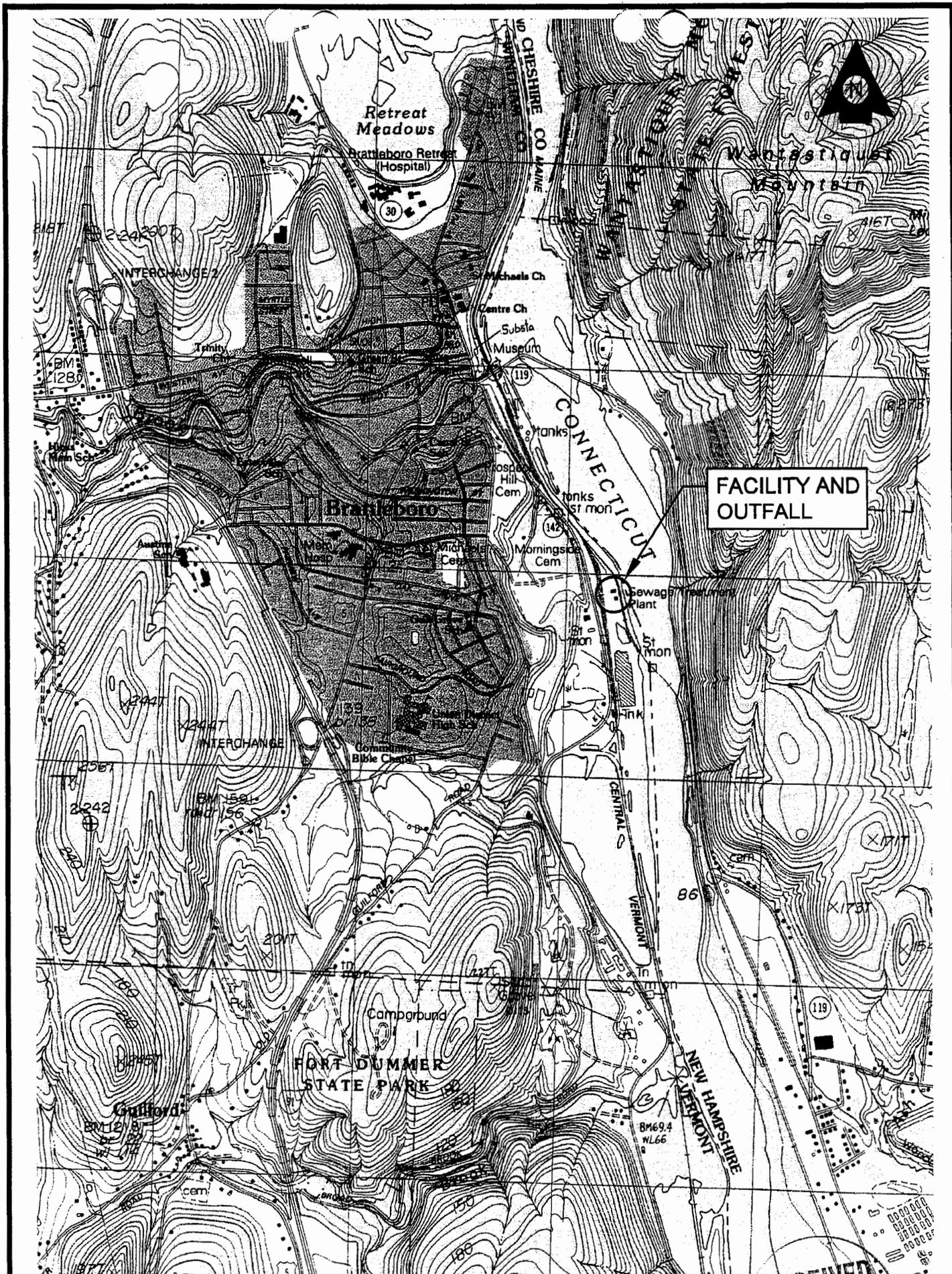
Comments may also be faxed to: 802-241-2596.

Any interested person or groups of persons may request or petition for a public hearing with respect to this draft permit. Any such request or petition for a public hearing shall be filed within the public comment period described above and shall indicate the interest of the party filing such request and the reasons why a hearing is warranted.

The Department will hold a hearing if there is significant public interest in holding such a hearing. Any public hearing brought in response to such a request or petition will be held in the geographical area of the proposed discharge or other appropriate area, at the discretion of the Department and may, as appropriate, consider related groups of draft permits. Any person may submit oral or written statements and data concerning the draft permit at the public hearing. The Department may establish reasonable limits on the time allowed for oral statements and may require the submission of statements in writing. All statements, comments, and data presented at the public hearing will be retained by the Department and considered in the formulation of the final determination to issue, deny, or modify the draft permit.

The complete application, draft permit, and other information are on file and may be inspected at the VTDEC, Wastewater Management Division, Waterbury Office. Copies will be made at a cost based on the current Secretary of State Official Fee Schedule for Copying Public Records from 8:00 am to 4:00 PM, Monday through Friday.

No comments were received during the public notice period.



TOWN OF BRATTLEBORO, VT
WWTF & OUTFALL LOCATION
SCALE: 1:25,000

RECEIVED
JAN 2 2004