

AGENCY OF NATURAL RESOURCES
Department of Environmental Conservation
1 National Life Drive, Main 2
Montpelier, VT 05620-3521

Response Summary for Comments Received on
Draft Indirect Discharge Permit ID-9-0006 Amendment

Cold Brook Fire District #1

July 17, 2017

The draft discharge permit amendment ID-9-0006-1 was placed on public notice from June 15, 2017 to July 14, 2017. During this period, comments were received from Waite-Heindel Environmental Management on behalf of the permittee regarding the draft permit. These comments and the Vermont Agency of Natural Resources' response to the comments are provided below. The actions taken as a result of the comments are indicated at the end of this document.

Comments re: Discrepancy in Golf Course Tract Requirements:

“Discrepancy in Golf Course Tract Requirements, Sections B2a [p. 17] and B5c [p. 20]: Although this permit amendment pertains to design changes at the Base Area Tract Treatment Facility and spray disposal field, Steve Bartlett (CBFD#1 WWTP operator) reviewed the entire existing and proposed permit. He noticed a discrepancy in the stated sampling frequency of the treatment lagoon monitoring wells at the Golf Course Tract. In the “Compliance Schedule Summary” on p. 17 (Section B2a), it states that the lagoon monitoring wells should be sampled quarterly, in Feb., June, Sept. and Dec. This is the sampling schedule that Mr. Bartlett has followed for many years. He recently noticed that Section B5c (“Groundwater Monitoring: Lagoon Monitoring Wells and Underdrains”, on p. 20) states that the lagoon monitoring wells should be sampled monthly. CBFD#1 would like to have this discrepancy corrected. Since the lagoon monitoring wells have been sampled quarterly instead of monthly for many years without any negative consequences, we suggest revising Section B5c to a quarterly sampling schedule.

Comment #1: Revise Section B5c to state that the lagoon monitoring wells at the Golf Course WWTP should be sampled quarterly, in February, June, September and December.”

Response:

The Agency agrees that the language in Condition B5c is ambiguous. The condition has been revised to make it clear that sampling is only required quarterly.

Comments re: Outdated QA/QC Plan:

“Outdated Groundwater Sampling Locations, Other Details of QA/QC Plan, Sections E5a, E5c: The current QA/QC Plan (Quality Assurance / Quality Control Plan; dated 9/30/1988) is outdated and should be updated. It should include revisions to reflect various aspects of the new permit amendment, including [but possibly not limited to] the items listed below. The engineering plans submitted by Stantec dated Nov. 2016, listed in Section E3a of the draft permit (p. 35), intentionally did not include updated sampling, monitoring and laboratory specs, assuming that an updated Monitoring Plan and QA/QC Plan would be submitted for review and approval at a later date. Possible items to be addressed:

1. Groundwater sampling and depth-monitoring locations to reflect the expanded Base Tract spray disposal area; [We note that the two surface water sampling stations in Haystack Brook appear to be in appropriate locations to characterize the expanded spray disposal area, so no changes in those sampling locations would be proposed];
2. Sampling protocols may need to be updated, since 1988;
3. Effluent and influent sampling and volume-monitoring requirements, particularly related to the trigger for a freeze on new connections to the Base Area WWTF until lagoon covers are designed, permitted and installed;
4. Laboratory specifications (both in-house and outside lab) may need updating, since 1988. A new Monitoring and Quality Assurance / Quality Control Plan would be prepared by WHEM and Stantec, with input from personnel of CBF#1 and the VTDEC Indirect Discharge Program. It would reflect, at a minimum, the topics listed above.

Comment #2: We suggest that an updated Monitoring and QA/QC Plan pertaining to the monitoring and reporting of conditions at the Wastewater Treatment Facilities and Spray Disposal Fields be submitted for DEC review and approval within 60 days of issuing the final permit.”

Response:

The Agency agrees that the QA/QC Plan is outdated. Conditions B5a, C5a, D5a and E5a have been revised to require the submittal of an updated QA/QC Plan by September 30, 2017.

Action Taken as a Result of Public Comment:

The Agency will issue the final permit amendment with the changes noted in the responses above.