

TOWN OF MIDDLEBURY

94 MAIN STREET MIDDLEBURY, VT 05753

Vermont Department of Environmental Conservation
Watershed Management Division
One National Life Drive, Main Bldg, 2nd Fl.
Montpelier, Vermont 05620-3522
Attention: Kari Dolan

Re: Proposed TMDL Allocation

December 11, 2013

Kari,

I was able to attend the public information meetings held in Montpelier and Middlebury on the proposed TMDL allocation.

The target limit of phosphorus being discharged into Lake Champlain is being lowered from 533 mt/yr (1,174,732 pounds) to 343 mt/yr (755,972 pounds). This would result in a 36% decrease or a decrease of 418,760 pound of phosphorus per year.

My comments are as follows;

- Wastewater Treatment Facilities

As discussed during the meetings, the Wastewater Treatment Facilities are permitted to discharge 56 mt/yr of phosphorus (123,424 pounds) but only contribute 17 mt/yr of phosphorus (37,468 pounds).

One of the proposals is to lower the permitted phosphorus limit from the WWTF to 12 mt/yr (26,448 pounds) and also lowering the monthly average from 0.8 mg/l to 0.1 mg/l.

The discharge at the Middlebury WWTF for phosphorus concentration in 2013 was 0.30 mg/l. Within the last 3 years the pounds of phosphorus discharged was as follows;

1. 2011 - 756 pounds of phosphorus
2. 2012 - 925 pounds of phosphorus
3. 2013 - 870 pounds of phosphorus (Anticipated)

If the concentration limit for phosphorus is moved to 0.1 mg/l then the pounds of phosphorus discharged from our facility would go down by approximately 572 pounds.

If this change could be a major catalyst in obtaining our common goal of cleaning Lake Champlain then we would fully support this action. But the reality is that the limited amount of phosphorus being released by the WWTF and with an estimated cost of 1.5 – 2.0 million dollars, this action does not seem to be a financially viable solution.

If you have any questions please contact me.

Sincerely,

Robert Wells, Wastewater Superintendent

Cc: Kathleen Ramsay, Town Manager
Dan Werner, Director of Operations