



**Vermont Department of Environmental Conservation  
Drinking Water and Groundwater Protection Division**

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*Agency of Natural Resources*

July 8, 2022

Melissa Manka, Planning Coordinator  
Town of Westford  
1713 VT Route 128  
Westford, VT 05494

RE: Revised Capacity Determination and Aquatic Permitting Criteria Assessment  
Jackson Farm Site, Westford, Vermont

Dear Melissa,

This letter is in response to the revised soil analysis and capacity determination report prepared by Stone Environmental for the Town of Westford's Capacity Determination for a New Indirect Discharge of Sewage for the Jackson Farm site in Westford, Vermont. The Indirect Discharge Program has reviewed the new soil investigations performed at the site, the revised desktop hydraulic capacity analysis, and revised evaluation of aquatic permitting criteria prepared by Stone Environmental.

The Indirect Discharge Program concurs that the proposed wastewater disposal area, referred to as Zone 3, at the Jackson Farm can accommodate up to 24,600 gallons per day of treated sewage at a loading rate of 0.9 gallons per day per square foot of trench area for a 100% dual alternation system.

The Indirect Discharge Program also concurs with the revised compliance assessment in the May 25, 2022 Stone Environmental memo that the proposed discharge will meet the Aquatic Permitting Criteria of the Indirect Discharge Rules in the Browns River. This is, however, a preliminary determination contingent upon verification of the background surface water quality. In accordance with the Indirect Discharge Rules, a minimum of ten surface water samples are required to be collected and analyzed, and the results sent to the Indirect Discharge Program for review prior to the issuance of an Indirect Discharge permit.

The Indirect Discharge Program is in the process of revising the Indirect Discharge Rules. The proposed wastewater disposal system will be subject to the Rules that are in effect at the time an application for an indirect discharge permit is submitted.

If you have any questions, please contact me at [Edward.greiner@vermont.gov](mailto:Edward.greiner@vermont.gov) or by

phone at (802) 622-4214.

Sincerely,

*Edward Greiner*

Edward Greiner, Environmental Scientist V  
Indirect Discharge Program

CC: Amy Macrellis, Stone Environmental  
Bryan Harrington, Indirect Discharge Program Supervisor