



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

One National Life Drive – Davis 4  
Montpelier, VT 05620-3521

[www.vermontdrinkingwater.org](http://www.vermontdrinkingwater.org)

*Agency of Natural Resources*

August 10, 2022

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

RE: Updated Revised Capacity Determination and Aquatic Permitting Criteria  
Assessment  
Maple Shade Site, Westford, Vermont

Dear Melissa,

This letter is an updated response to the March 15, 2022 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 Maple Shade 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 can accommodate the following volumes of treated sewage under the two options presented below:

- Option 4 is a 100% dual alternation trench system, with a proposed loading rate of 1.5 gallons per day per square foot of trench area with pretreatment, up to 24,600 gpd.
- Option 5 is a drip disposal system with a proposed loading rate of 0.9 gpd per square foot with no disposal field alternation (designed and constructed to 200% disposal capacity), up to 24,300 gpd.

The hydrogeologic analysis was only completed for option 4, however the Indirect Discharge Program agrees with the assessment that Option 4 is the most conservative groundwater mounding demonstration. Therefore, it is expected that Option 5 will also meet the requirements of §14-1401(a)(1)(E) of the Indirect Discharge Rules.

The Indirect Discharge Program also concurs with the revised compliance assessment in the May 25, 2022 Stone Environmental letter 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 to demonstrate compliance with Aquatic Permitting Criteria prior to or as part of an application for 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 Analyst V  
Indirect Discharge Program

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