

---

**Erosion Prevention and Sediment Control Plan Narrative  
for a Construction Stormwater Discharge Permit  
Application**

---

***VERMONT RAILWAYS INC.***  
***SHELBURNE TRANSLOAD FACILITY***

Shelburne, Vermont

---

Prepared for **Vermont Railways**  
One Railway Lane  
Burlington, VT 05401

Prepared by **VHB**  
40 IDX Drive, Building 100  
Suite 200  
South Burlington, VT 05403

**December 23, 2015**



---

## Table of Contents

Table of Contents .....	i
1.0 Introduction .....	1
2.0 Project Overview.....	1
3.0 Location Map .....	6
4.0 Erosion Prevention and Sediment Control Plan .....	6
References and Resources.....	7

### Appendix:

- Site Map
- Risk Evaluation
- Natural Resources Map with Soils Information
- EPSC Plan Summary Form
- EPSC Plan, Notes and Details



---

## 1.0 Introduction

On behalf of the applicant, Vermont Railways (“VRS” or “Applicant”), VHB is submitting this Erosion Prevention and Sediment Control (“EPSC”) Plan narrative and enclosed supporting application materials to comprise an application to the Vermont Department of Environmental Conservation (“VT DEC”) to discharge construction-phase stormwater under General Permit 3-9020 (GP 3-9020) for the construction of the Shelburne Transload Facility (the “Project”) located off of Route 7 in Shelburne (Chittenden County), Vermont (see Site Location Map in the Appendix). Completion of the Risk Evaluation for this Project determined that the Project is eligible for GP 3-9020 as a Moderate Risk project (see Risk Evaluation on pages 2 through 5 of the Appendix). As such, application materials, in addition to the Site Location Map, Risk Evaluation, and this EPSC Plan narrative, include: a signed Notice of Intent (“NOI”) form, fee check made payable to State of Vermont, Natural Resources Map, EPSC Plan Summary Form, and EPSC Plan set with notes and details.

---

## 2.0 Project Overview

This EPSC Plan narrative has been prepared using GP 3-9020, Part 4.1(C) and Appendix B of GP 3-9020 as guidance. The following sections (a) through (m) of this narrative address EPSC Plan narrative elements in the order that they are presented in Appendix B of GP 3-9020. The EPSC Plan narrative and the associated EPSC Plan (enclosed) have been prepared in conformance with the most recent edition of the *Vermont Standards and Specifications for Erosion Prevention and Sediment Control* (2006, Amended 2008).

### a. Project Type and Description

The project consists of the construction of a salt storage and distribution facility. The major project elements include:

- Access road and rail spur
- Two (2) new 35' x 350' storage buildings;
- 75' long truck, 35' long truck and employee parking areas;
- Shop, office and two additional storage buildings;



- Truck weighing scales
- Aboveground storage tank fuel pad and Fleet Fuel island facility;

This facility will have salt delivered by rail which will be stored and distributed by trucking. The fuel island will be used by the facility and possibly expanded to be opened to the public if the interest is found. On site there will be truck scales, shop and office facilities to support the operations.

#### **b. Major Project Components**

Major project components will involve clearing of vegetation and removal of trees, earthwork and grading for the construction of the railroad spur, access road, salt storage sheds, and truck and employee parking and fuel island facility. Sequencing of construction activities is discussed in Section 2.d. Surface stormwater runoff generated by proposed impervious surfaces will be captured and directed east to west to the proposed stormwater management system, which will consist of a stormwater detention pond or treatment swale. This project is owned by VRS and therefore subject to a federal preemption, which precludes the Project from being required to meet Vermont Stormwater Treatment Standards. However, the Project will be designed to meet the relevant standards of the 2002 Vermont Stormwater Management Manual in order to provide appropriate stormwater treatment and control, and to protect downstream natural resource area (see Natural Resources Map in Appendix).

#### **c. Total Earth Disturbance**

The total area of proposed earth disturbance associated with these activities is 19.34 acres. Construction and stabilization will be conducted pursuant to the project's EPSC Plan, the *Vermont Standards and Specifications for Erosion Prevention and Sediment Control* (2006, Amended 2008), and the *Vermont Erosion Prevention and Sediment Control Field Guide* (2006). During construction, oversight of earthwork and stabilization will be conducted by professionals experienced in EPSC measures and their implementation, including an On-Site Plan Coordinator ("OSPC") per the permit.

#### **d. Sequence of Major Project Components**

As described above, major project components will involve: construction of a storage and distribution facility, including two (2) 35' x 350' storage buildings; 75' and 35' long truck and employee parking areas; a shop/office; two (2) additional storage buildings, truck weighing scales, aboveground storage tank fuel pad, Fleet Fuel island facility, and a permanent stormwater management system. For activities that will



generate earth disturbance, the general sequence of construction activities will take place in 2015 and 2016, as follows (such that no more than 5 acres are disturbed at one time):

#### Winter 2015/2016

1. Installing EPSC measures per the EPSC Plan, including a stabilized construction entrance, silt fence, and reinforced silt fence within 50 feet of water resource areas (wetland draining to LaPlatte River)
2. Tree clearing to facilitate construction of the new access road, office and shop building and other smaller buildings.
3. Earthwork to facilitate preloading building sites, including temporary and permanent soil stockpiling.
4. Temporarily stabilizing building areas while preloading occurs.
5. Tree clearing for salt sheds and Parking areas.
6. Earthwork to facilitate preloading salt sheds.
7. Temporarily stabilizing salt shed areas.
8. Tree clearing for Railroad.
9. Earthwork and construction of Railroad embankment.
10. Temporary stabilization of Railroad embankment

#### Spring, summer and fall 2016

1. Re-installing and maintaining EPSC measures per the EPSC Plan, as needed, in anticipation of spring snowmelt and the 2016 construction season.
2. Construction of buildings (sheds, storage buildings, and office/shop).
3. Installing facility equipment and infrastructure, including utilities.
4. Installation of fuel island and above ground storage tanks.
5. Final grading throughout the site, including the permanent stormwater management system.
6. Permanent stabilization, removal of temporary EPSC measures, restoration, and clean up.

#### **e. Maximum Concurrent Earth Disturbance**

The total maximum concurrent earth disturbance proposed for the project is 5.0 acres or less, as referenced in the Risk Evaluation on pages 2 through 5 of the Appendix. There will be a designated OSPC that is responsible for daily oversight of construction, proper implementation of the EPSC Plan,



on-going compliance with construction-phase stormwater discharge permit conditions, and on-going reporting.

**f. Vegetated Buffers**

Although the Project has been designed to minimize impacts to receiving waters as much as possible, it will not be able to maintain at least a 50-foot vegetative buffer between areas of earth disturbance and potential receiving waters in all areas. Where a 50-foot vegetative buffer is not able to be maintained, the Project will utilize EPSC measures (e.g., silt fence), as well as diversion of runoff to direct stormwater flow away from resource areas where possible. The Risk Evaluation was scored accordingly (see pages 2 through 5 of the Appendix).

**g. Duration of Exposed Soils**

The total proposed duration of exposed soil is a maximum of 14 days from initial disturbance prior to temporary or permanent stabilization, as recorded in the Risk Evaluation on pages 2 through 5 of the Appendix.

**h. Receiving Waters**

Receiving waters within the project area include Wetland 2015-4, 2015-3 and 2015-1 (draining to the La Platte River) which are located within the LaPlatte River watershed (see Natural Resources Map in the Appendix). The LaPlatte River watershed is included on the 2014 State of Vermont 303(d) List of Impaired Waters. Particular attention will be given to installation and maintenance of EPSC measures per the EPSC Plan, including use of reinforced perimeter controls within 50 feet of water resource areas, and protection of inlets and roadside ditches, where applicable.

**i. Drainage Areas and Soil Types**

As described in Section 2.0(h), the project area is primarily located within the LaPlatte River watershed. As depicted in the Natural Resources Map on page 6 of the Appendix, underlying soils include: Adams and Windsor loamy sands, zero to five percent slopes, as classified by the Natural Resources Conservation Service ("NRCS"). The EPSC Plan Summary Form on page 9 of the Appendix provides a



list of soil types with their soil erodibility ratings (k-values) and typical slopes, as classified by the NRCS.

**j. Stream Crossings**

There are no stream crossings nor other impacts to streams proposed as part of construction activities for this Project.

**k. Wetland Impacts**

There are no mapped wetlands to be impacted. Wetlands were delineated by VHB and the delineation was approved by USACE Wetlands Mike Adams on October 27, 2015. Wetland locations are indicated on the Natural Resources Map found in Appendix. The Project includes one temporary wetland crossing for permanent soil stockpiling purposes. The crossing will be achieved by construction of waste block abutments spanned by a temporary deck, and no temporary or permanent impacts to the wetland will occur.

**l. Off-site Waste and Borrow Areas**

Project construction is not intended to result in the need for off-site waste disposal. Waste stockpile areas are incorporated into the overall project LOD. If off-site waste disposal is needed, VT DEC will be notified beforehand. With regard to borrow areas, project construction will require the use of gravel to construct the new access driveway, and build the railroad embankment. The specific borrow areas where material will be obtained is currently pending; however, VT DEC will be notified prior to its use. The Applicant is aware that this borrow area must either have or obtain coverage under its own construction-phase stormwater discharge permit, or have coverage as a co-permittee under the project's permit.

**m. Winter Construction**

It is anticipated that project activities may occur during the winter construction season (October 15 to April 15). Therefore, special winter construction EPSC notes per the *Vermont Standards and Specifications for Erosion Prevention and Sediment Control* (2006, Amended 2008) have been included on the EPSC Plan.



---

### **3.0 Location Map**

The Site Location Map depicting the project site and potential receiving waters is included on page 1 of the Appendix.

---

### **4.0 Erosion Prevention and Sediment Control Plan**

The EPSC Plan that has been prepared for the Project includes: (1) existing conditions site plan sheets with existing topography, (2) construction conditions plan sheets with an overlay of major project components, including proposed grading, infrastructure, and EPSC measures, and (3) final stabilization plans. In addition to other information, the EPSC Plan provides the contractor with specific instruction for construction and stabilization activities during both the regular and winter construction seasons. The EPSC Plan also provides the contractor with information specific to EPSC measures to be installed if construction activities are occurring within 50 feet of water resource areas (e.g., streams and wetlands). Lastly, the EPSC Plan provides the contractor with instructions to be followed in anticipation of rainfall and/or thaw events in order to minimize the potential for erosion and, in turn, maintain sediment on-site to the extent feasible.



---

## References and Resources

Vermont Agency of Natural Resources, Vermont Department of Environmental Conservation, *State of Vermont 303(d) List of Waters, Part A – Impaired Surface Waters in Need of TMDL, 2014*; accessed online: [http://www.vtwaterquality.org/mapp/docs/mapp\\_303d\\_2014.pdf](http://www.vtwaterquality.org/mapp/docs/mapp_303d_2014.pdf)

Vermont Agency of Natural Resources, Department of Environmental Conservation, *The Vermont Standards and Specifications for Erosion Prevention and Sediment Control, 2006* (Amended 2008).

Vermont Agency of Natural Resources, Vermont Department of Environmental Conservation, *Vermont Erosion Prevention and Sediment Control Field Guide, 2006*.

Vermont Agency of Natural Resources, Vermont Department of Environmental Conservation, *Vermont Water Quality Standards, Environmental Protection Rule Chapter 29(a), 2014*.

\\WTNFDATA\projects\57762.00\docs\Permits\9020\EPSC Plan Narrative\_12-14-15.docx