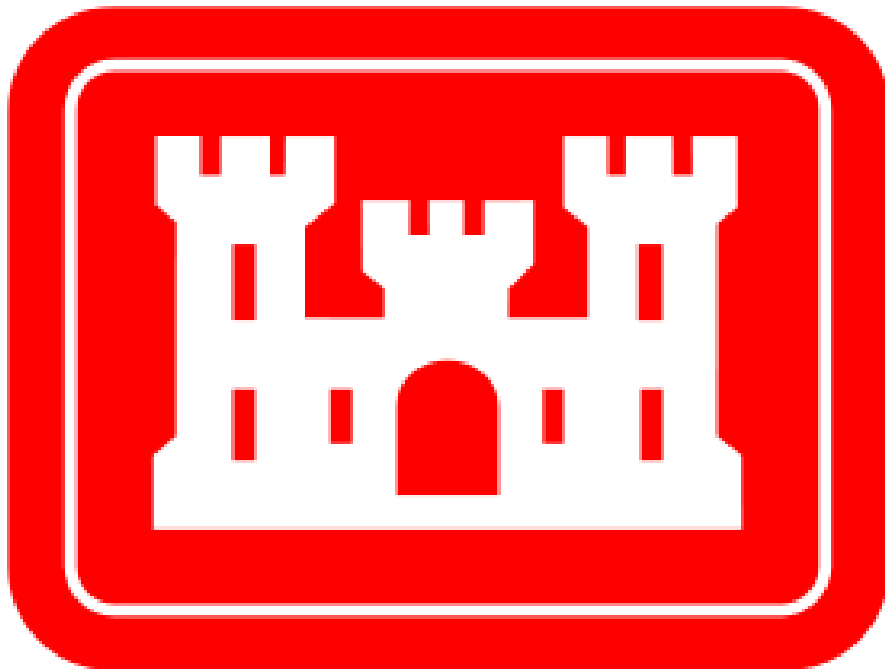


Draft Environmental Assessment  
Section 571 Town of Hartford  
Mason County, West Virginia



U.S. Army Corps of Engineers  
Huntington District  
Huntington, West Virginia

September 2012

DRAFT FINDING OF NO SIGNIFICANT IMPACT  
SECTION 571 TOWN OF HARTFORD  
SEWER COLLECTION SYSTEM IMPROVEMENT PROJECT  
MASON COUNTY, WEST VIRGINIA

1. Members of my staff have conducted an environmental assessment, in the overall public interest, concerning the implementation of the Town of Hartford Sewer Collections System Improvement Section 571 Project. The purpose of this project is to upgrade a deteriorating wastewater collection system. This action will improve water quality and the health and safety of the community for years to come. The proposed project is authorized under Section 571 of the Water Resources Development Act (WRDA) of 1999 (PL 106-53).
2. The possible consequences of the project have been studied for environmental, cultural and social well-being impacts. Another factor bearing on the investigation was the capacity of the action to meet the needs of the public for whom it was proposed.
3. The Proposed Action Alternative (PAA) and the No Action Alternative (NAA) were the only alternatives carried forward for detailed evaluation. The PAA is the most cost effective and is both environmentally and socially acceptable. The NAA would not be in the public's best interest and would have continued negative impact on the natural resources of the area.
4. An evaluation of the PAA and the NAA produced the following pertinent conclusions:
  - a. Environmental Considerations. The Huntington District has taken reasonable measures to assemble and present the known or foreseeable environmental impacts of the project in the Environmental Assessment (EA). All adverse effects of the project implementation are considered insignificant and should last only a few months longer than the construction period.
  - b. Social Well-Being Considerations. The proposed project will ensure safe conveyance and treatment of wastewater for the Town of Hartford. No significant economic or social well-being impacts that are both adverse and/or unavoidable are foreseen as a result of the proposed action. The project will not have any impact on sites of known significant archeological or historic importance. Hazardous, Toxic, and Radioactive Waste (HTRW) present on the site (underground storage tanks) will not be impacted.
  - c. Coordination with Resource Agencies. Pursuant to the Fish and Wildlife Coordination Act (FWCA) of 1958, coordination with the U.S. Fish and Wildlife Service (USFWS), Natural Resource Conservation Service (NRCS), the West Virginia State Historic Preservation Office (SHPO), and the West Virginia Department of Fish and Wildlife has been maintained throughout the study. Appropriate measures and best management practices will be identified and incorporated into the PAA. Also, in accordance with the Endangered Species Act, as amended, the recommended plan should not impact listed species.

d. Other Pertinent Compliance. No prime or unique farmland under the Farmland Protection Policy Act (FPPA) will be involved. The PAA is also in compliance with the National Historic Preservation Act (NHPA Section 106, 36 CFR 800), Executive Order (EO) 11988 (Floodplain Management), and EO 11990 (Protection of Wetlands).

e. Other Public Interest Considerations. There has been no significant opposition to the PAA. Comments received during the public review period are included in this EA.

f. Section 176(c) Clean Air Act. The PAA has been analyzed for conformity and applicability pursuant to regulations implementing Section 176(c) of the Clean Air Act (CAA). The PAA will not exceed *de minimis* levels or direct emissions of a criteria pollutant or its precursors and is exempted by 40 CFR Part 93.153. Any later indirect emissions are generally not within the District's continuing program responsibility and generally cannot be practicably controlled by the District. For these reasons a conformity determination is not required for the action.

5. I find the Town of Hartford Section 571 Sewer Collection System Improvement Project has been planned in accordance with current authorization as described in the EA. The PAA is consistent with national policy, statutes and administrative directives. This determination is based on thorough analysis and evaluation of the PAA and alternative courses of action. In conclusion, I find the proposed Town of Hartford Section 571 Sanitary Collection System Improvement Project will have No Significant Adverse Impact on the quality of the human environment.

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Date

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Steven T. McGugan  
Colonel, Corps of Engineers  
District Engineer



**DRAFT ENVIRONMENTAL ASSESSMENT  
SECTION 571 TOWN OF HARTFORD  
SEWER COLLECTION SYSTEM IMPROVEMENT PROJECT  
MASON COUNTY, WEST VIRGINIA**

**RESPONSIBLE AGENCY:** U.S. Army Corps of Engineers, Huntington District, West Virginia

**ABSTRACT:** In accordance with the National Environmental Policy Act, the U.S. Army Corps of Engineers (USACE) Huntington District has prepared this Draft Environmental Assessment (EA) to document the evaluation of potential environmental impacts of improvements to the wastewater collection system in the Town of Hartford located in Mason County, West Virginia. The proposed action described below entails USACE providing approximately \$171,000 of funding for the project. The Huntington District's review and analyses of economic, human and natural environments, and engineering designs have determined that the Proposed Action Alternative (PAA) would address the purpose and need for the project and would have minimal adverse impact on the human environment.

The PAA is the most economical and environmentally sound project that meets the purpose and need. The work effort for the PAA includes the construction 1,500 linear feet of two inch force main sewer line, repair and/or replace 130 manholes, and rehabilitation of five pumping stations and related appurtenances. The Draft EA also presents the results of the evaluation of the Proposed Action's potential impacts, both positive and negative. Positive impacts are associated with improved sewer collection system for the Town of Hartford which will enhance the socioeconomic setting, as well as improve the overall water quality in the area by eliminating issues related to Infiltration and Inflow. Adverse impacts include those associated with construction of the project, but are expected to be minor and temporary.

The proposed project is authorized under Section 571 of the Water Resources Development Act of 1999 (Public Law No. 106-53).

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SECTION 571 TOWN OF HARTFORD  
SEWER COLLECTION SYSTEM IMPROVEMENT PROJECT  
MASON COUNTY, WEST VIRGINIA

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## Summary

The proposed sewer collection system improvement Project Area is in the Town of Hartford, West Virginia located in Mason County. Information gathered for the preparation of the draft Environmental Assessment (EA) was derived from federal, state, and local agencies and databases. Areas of concern, including aquatic and terrestrial ecosystems, wetlands, socioeconomic conditions, Hazardous, Toxic, and Radioactive Waste (HTRW), and underground storage tanks (USTs), were evaluated for potential adverse impacts. Impacts associated with the Project Area are anticipated to be minimal as the project will be located within a previously disturbed area. Minimal and temporary negative impacts are anticipated throughout the Project Area as a result of improvements to the sewer collection system.

## 1.0 PROJECT DESCRIPTION

### 1.1 Project Background

This Draft EA examines the potential environmental impacts of the Town of Hartford Sewer Collections System Improvement Project as proposed by Town of Hartford. The purpose of the Draft EA is to analyze the potential environmental impacts of the proposed project, and to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No significant Impact (FONSI). The U.S. Army Corps of Engineers (USACE) Section 571 program provides funds to communities, counties and other public entities for design and construction of water-related environmental infrastructure, resource protection and development, and restoration projects in Central WV.

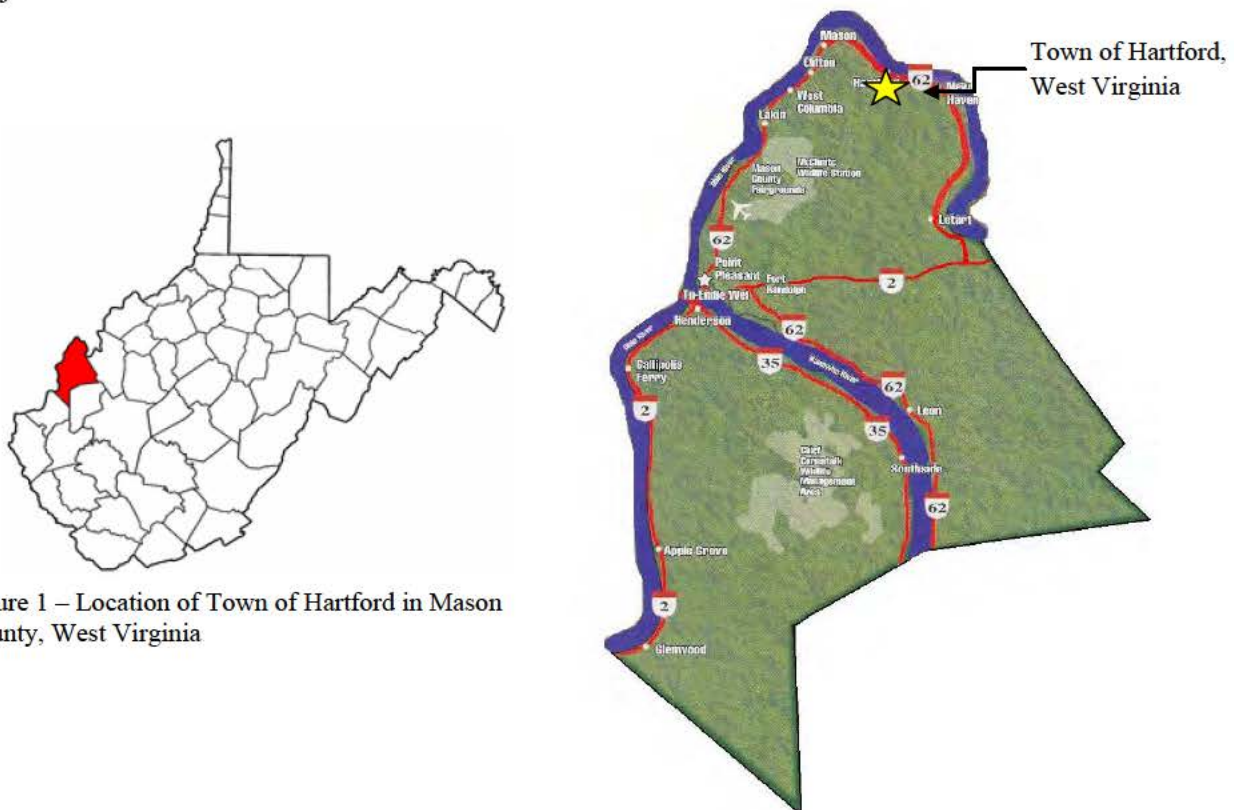


Figure 1 – Location of Town of Hartford in Mason County, West Virginia





The Town of Hartford and the surrounding area experiences issues related with Infiltration and Inflow (I&I). Infiltration refers to groundwater that enters into sewer collection systems through cracks and/or leaks in the collection pipes. Inflow refers to storm water that enters into sewer collection systems through points of direct connection. I&I pollutes the local ground water with untreated and improperly treated wastewater when the I&I capacity of the system is exceeded, causing a decline in the standard of living in the community and creating a potentially serious health problem. Improving the sewage collection system in the Town of Hartford would help to eliminate the current problem. The Project Area is located in the Town of Hartford which is a component of the Ohio River Watershed in the central portion of West Virginia. See Appendix A for all maps of the area.

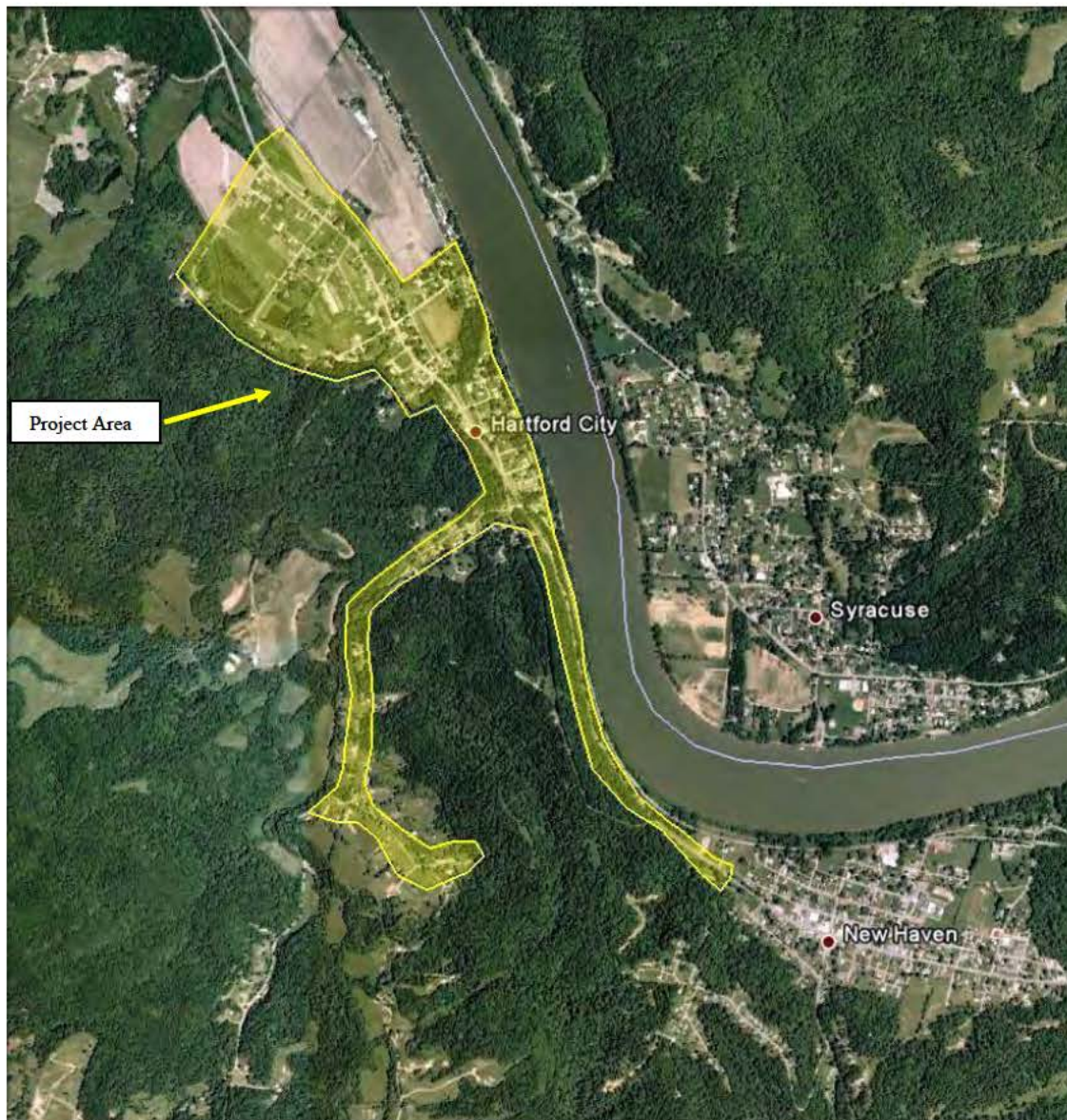


Figure 2 – Location of Town of Hartford, WV



## **1.2 Purpose, Need and Authorization**

The purpose of the proposed project is to provide an adequate and reliable sanitary sewer service for the Town of Hartford in Mason County, West Virginia. The need for an improved sewer collection system in the project area is primarily a health and safety issue. The proposed project has been designed to reduce the amount of I&I entering the sewer collection system. Currently untreated and improperly treated wastewater enters the groundwater and streams when the I&I overwhelms the capacity of the existing system. A study of water flow from the Town of Hartford was conducted between July 2008 and July 2009. The flow record indicated a moderate to high rate of I&I, especially during wet weather. It was determined that deterioration of joints between sections of pipe, cracked pipes, leaky manholes and cross connections from storm sewers are the causes of the I&I. The Town of Hartford is located near mile 247 of the Ohio River, therefore all overland runoff and stream discharge from the deteriorating sewer collection system eventually enters the Ohio River.

Studies for this project were authorized under Section 571 of the Water Resources Development Act of 1999 (Public Law No. 106-53), which provides authority for the Secretary of the Army to establish a program to provide environmental assistance to non-federal interests in Central West Virginia. This law provides assistance for design and construction of water-related environmental infrastructure and resource protection and development projects in Central West Virginia, including projects for wastewater treatment and related facilities; water supply and related facilities and surface water resource protection and development.

This Draft EA was prepared pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) Regulations (40 CFR 1500-1517), and USACE implementing regulation, ER 200-2-2, 1988.

## **2.0 PROPOSED ACTIONS AND ALTERNATIVES**

### **2.1 Proposed Action Alternative**

The Proposed Action Alternative (PAA) would be to construct 1,500 linear feet of 2 inch force main sewer line, repair and/or replace 130 manholes, and rehabilitation of 5 pumping stations and related appurtenances. The PAA would provide improved service to 239 customers of the Town of Hartford.

### **2.2 No Action Alternative**

The No Action Alternative (NAA) would be to deny federal funding for the project through the Section 571 program resulting in the sewer collection system improvements not being constructed.





### **3.0 ENVIRONMENTAL SETTING AND CONSEQUENCES**

#### **3.1 Location**

The project area is located within the unglaciated portion of the Allegheny Plateau which is the western subsection of the Appalachian Plateau physiographic province of West Virginia. Flat topped highlands and rounded hills characterize this area of the physiographic province. The project area is located within the Ohio River floodplain and exhibits relatively level stream terraces where the majority of the development occurs. The area that would benefit from the proposed project is primarily commercial and/or residential including apartment complexes, fueling stations, local businesses, and private residences.

#### **3.2 Terrestrial Habitat**

The project area for the PAA improvements is within road right-of-ways throughout the Town of Hartford. The project area is characterized as previously disturbed and maintained with local grasses. The current land use would not change with implementation of the PAA. Considering the project area size, location, and scope, there would be no impacts to land use from the PAA. The NAA would have no affect on land use.

The PAA would be constructed entirely on previously disturbed areas, including road right-of-ways; therefore potential impacts to vegetation would be minimal and temporary. The project area will be stabilized and reseeded with grasses in order to be returned to pre-construction condition as soon as possible upon work completion per stipulations in the Soil Conservation Service permit obtained by the Town of Hartford for the PAA. Only short-term impacts during construction with no long-term adverse impacts are anticipated to occur from the PAA. No impacts to vegetation are anticipated to occur from the NAA.

The Fish and Wildlife Coordination Act (FWCA) requires federal agencies to take action to prevent loss or damage to wildlife resources, and provide for the measures taken to mitigate such impacts. Wildlife and wildlife resources are defined by the FWCA to include: birds, fish, mammals and all other classes of wild animals and all types of aquatic and land vegetation upon which wildlife is dependent. The majority of the PAA project area is previously disturbed road right-of-ways. All areas impacted by the PAA will be stabilized and reseeded to pre-construction condition. No impacts to fish and wildlife are anticipated to occur from the NAA or the PAA, due to the previously disturbed nature of the proposed project area.

Executive Order 11988 requires federal agencies to consider the potential effects of their proposed actions to floodplains. In order to determine the PAA's potential floodplain impact, the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) were reviewed by the Town of Hartford Floodplain Manager and the USACE. The manhole and pump station rehabilitations included in the PAA will be located within the 100-year floodplain; however the PAA only includes work to existing manhole and pump station structures. The covers for the manholes and pump stations will be replaced with anchored and sealed frame covers to ensure that they are water tight to avoid potential impacts to the sewer collection



system in the event of a flood. Control and electric panels for the pump stations will be elevated above the 100-year floodplain. The mounting poles for the control panels will be the only above ground structures constructed for the PAA within the 100-year floodplain. No impacts to floodplains are anticipated to occur from the PAA or NAA.

The Farmland Protection Policy Act (FPPA) requires federal agencies to minimize the conversion of prime and unique farmland to non-agricultural uses. The Natural Resource Conservation Service (NRCS) was contacted to determine if the PAA would impact prime or unique farmland potentially located within the project area. The NRCS determined that the proposed project area has been previously disturbed and will not result in a negative impact to any Prime Statewide Important or Locally Important Farmlands; therefore, neither the PAA nor NAA would result in impacts to prime or unique farmlands. Correspondence from the NRCS can be found in Appendix C.

### **3.3 Aquatic Habitat**

The Federal Water Pollution Control Amendments of 1972 and the Clean Water Act of 1977 collectively set regulatory standards on the discharge of various pollutants into surface water resources. The disposal of untreated or improperly treated wastewater into streams and rivers can contribute to poor water quality which can degrade aquatic resources in a variety of ways. For example, untreated or improperly treated wastewater can increase the amount of toxic metals and chemicals present in a water body which can deposit in silts and sediments creating a chronic impact that is not easy to clean up or eliminate. Untreated or improperly treated wastewater can result in high levels of fecal coliform bacteria which can lead to increased biological oxygen demand (BOD) that can rapidly deplete oxygen levels within the water, resulting in poor aquatic diversity; in extreme cases the death of fish and other aquatic life.

The PAA would eliminate untreated and improperly treated wastewater from I&I events entering the local streams and eventually the Ohio River. Positive impacts and cumulative water quality improvements would occur long-term with the prevention of untreated and improperly treated wastewater from entering groundwater and streams. Potential localized and short-term impacts to water quality could occur with construction of the PAA. However, with the implementation of Best Management Practices (BMPs), such as erosion control and timely reseeding of disturbed area, impacts would be minimal and temporary. The NAA would allow for continued releases of untreated and improperly treated wastewater from I&I events to enter the local streams negatively impacting water quality in the Project Area.

Section 404 of the Clean Water Act (CWA) regulates discharges into special aquatic sites including wetlands, and Executive Order 11990 requires federal agencies to take action to minimize the destruction, loss, or degradation of wetlands, and to preserve, enhance the natural and beneficial values of wetlands in carrying out their respective responsibilities. National Wetland Inventory Maps (NWI) were reviewed for the project area and site assessments were completed to determine if wetlands are present. A Freshwater emergent and freshwater scrub/shrub wetland is located adjacent to the project area along County Route 4 (Sliding Hill Road). The activity in this area includes the rehabilitation of pump station #4 and replacement of



800 linear feet of force main sewer line. A site assessment was completed by Triad Engineering. It was determined that the wetland is a sufficient distance from the construction area to conclude that no wetlands will be impacted the construction activity. No impacts to wetlands are anticipated to occur from the NAA or the PAA.

The West Virginia Department of Environmental Protection (WVDEP) reviewed the PAA and concluded that a construction storm water permit would be issued for the project. The USACE Huntington District Regulatory Branch, South Regulatory Section determined that the PAA falls under a Nation Wide Permit #12 Utility Line Projects. The PAA includes no stream crossings; therefore no impacts to streams or riparian habitat are anticipated from the PAA or NAA. Correspondence from the WVDEP and the USACE can be found in Appendix C.

No designated State Wild or Scenic Rivers are present within the Project Area. Since no State Wild or Scenic Rivers are located within the Project Area, no impacts to these resources are anticipated from the PAA or NAA.

### **3.4 Hazardous, Toxic, and Radioactive Waste (HTRW)**

A Phase I HTRW Environmental Site Assessment was conducted by Triad Engineering, Inc. in December of 2011 for the Town of Hartford Wastewater Collection System Improvements, to identify environmental conditions and to identify the potential presence of HTRW contamination located in the project's construction work limits. The investigation was performed in accordance with ASTM E-1527-05 and 1528-06 Standards, USACE HTRW policies and Corps of Engineers Huntington District ISO 9001 requirements. This assessment has revealed no evidence of recognized environmental conditions in connection with the property except for the following:

- Three of the sewer pump stations have diesel underground storage tanks (UST) of unknown size that remain. They were installed to supply fuel to the generators in the event of a power outage. Although they are not currently being used, the age and condition of the USTs are unknown; therefore a leak may have occurred.

It is not anticipated that any UST will be uncovered or removed with the construction of the PAA. However, if an UST is uncovered during the construction of the PAA, the USACE and WVDEP will be contacted to insure proper state and federal requirements are met. The USACE has determined that this strategy is sufficient and no further HTRW action is required at this time. The NAA would not result in ground disturbing activities, and would not disturb areas of HTRW contamination.

### **3.5 Cultural Resources**

Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to take into account the effects federal undertakings will have on districts, sites, buildings, structures, or objects (Cultural Resources) listed in or eligible for inclusion in the National Register of Historic Places (NRHP). The PAA is not anticipated to affect religious sites or ceremonial rites of Native Americans, any property listed or eligible for listing on the NRHP, any property listed as a





National Historic Landmark, or any archeological resource. The West Virginia State Historic Preservation Officer (SHPO) was contacted regarding this determination and concurred that there are 'No Historic Properties Present' within the project area; therefore no impacts to cultural resources are anticipated to occur from the PAA. The SHPO issued a concurrence letter dated October 23, 2009, which can be found in Appendix C with the agency correspondence.

No impacts to cultural resources or historic properties are anticipated to occur from the NAA.

### **3.6 Threatened and Endangered Species**

The Endangered Species Act of 1973 requires federal agencies to consider the effects of actions on Federally listed endangered, threatened, and/or candidate species. The U.S. Fish and Wildlife Service (USFWS) and the West Virginia Department of Natural Resources (WVDNR) were contacted regarding threatened and endangered species in the Project Area. The USFWS and WVDNR concluded that no effect to threatened or endangered species is anticipated to occur from the PAA. Correspondence from the USFWS and WVDNR can be found in Appendix C.

No impacts to threatened or endangered species are anticipated to occur from the NAA.

### **3.7 Air Quality**

The Clean Air Act (CAA) allows the U.S. Environmental Protection Agency (USEPA) to set air quality standards for pollutants considered harmful to public health and welfare. The National Ambient Air Quality Standards (NAAQS) set limits to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly. These standards have been established for six criteria pollutants including Carbon monoxide (CO), Lead (Pb), Nitrogen dioxide (NO<sub>2</sub>), Ozone (O<sub>3</sub>), Particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), and Sulfur dioxide (SO<sub>2</sub>), and each state is required to develop implementation plans for each pollutant. Areas are generally in “attainment” of the standards for the pollutants listed above or in “nonattainment”. Nonattainment areas are required by the CAA to comply with the NAAQS standards through the evaluation and development of a maintenance plan. The USEPA makes a conformity determination to assure that the actions within the maintenance plan would conform to the respective state’s implementation plan for each nonattainment pollutant.

According to the USEPA 2008 Region 3 Status, Mason County, WV is classified as “attainment” for NAAQS pollutants. However, a portion of Mason County is included in the USEPA 1997 “non-attainment” determination for the Huntington-Ashland area NAAQS PM<sub>2.5</sub> pollutant. The implementation and operation of the PAA would not result in significant impacts to air quality; however, construction of the PAA would have the potential to cause localized and temporary, nuisance air quality impacts. Potential sources of these impacts include emissions from heavy equipment operation which include diesel fuel fumes and exhaust. The PAA would not require around the clock construction; therefore, equipment downtime would allow for dispersion of the nuisance fumes generated during operation. The proposed action is therefore exempt from making a conformity determination, since estimated emissions from construction equipment



would be far below the *de minimis* standards of 100 tons/year, which are the minimum threshold for which a conformity determination must be performed.

The NAA would not generate construction related air emissions; however, the NAA could result in the continuation of localized foul odors originating from untreated or improperly treated wastewater discharges into surface water conveyances including roadside ditches, streams, and the Ohio River

### 3.8 Noise

#### 3.8.1 Background

Noise is measured as Day Night average noise levels (DNL) in "A-weighted" decibels that the human ear is most sensitive to (dBA). There is no federal standard for allowable noise levels; however, the USACE and other federal agencies have adopted guidance for evaluating noise level impacts.

The USACE Safety and Health Requirements Manual (September 2008) provides criteria for permissible noise exposure levels, as well as thresholds for the consideration of hearing protection and/or the implementation of sound reduction controls. Table 1 presents the minimum duration and noise level thresholds outlined in the USACE Safety and Health Requirements Manual.

**Table 1**  
**Permissible Non-Department of Defense Noise Exposures**

Duration/day (hours)	Noise level (dBA)
8	90
6	92
4	95
3	97
2	100
1.5	102
1	105

Source: USACE Safety and Health Requirements Manual, 2008

The Department of Housing and Urban Development (HUD) Guidelines denote DNLs below 65 dBA as normally acceptable levels of exterior noise in residential areas. Several other agencies, including the Federal Energy Regulatory Commission, use a DNL criterion of 55 dBA as the threshold for defining noise impacts in sparse suburban and rural residential areas (Schomer et al 2001). According to Dr. Paul Schomer in his 2001 Whitepaper, while there are numerous thresholds for acceptable noise in residential areas, research suggests that an area's current noise environment, which has experienced noise in the past may reasonably expect to tolerate a level of noise about 5 dBA higher than the general guidelines. Down and Stock (1978) conducted a study to determine the human reaction to progressive sound increases. The results of the study



indicate that increases in ambient noise levels below 5 dB go unnoticed while every 5 dB increase above that level becomes increasing noticeable and increases over 20 dB are intolerable (Table 2).

**Table 2**  
**Human Reaction to Increases in Sound Pressure Level**

<b>Increase in Sound Pressure (dB)</b>	<b>Human Reaction</b>
Under 5	Unnoticed to tolerable
5 – 10	Intrusive
10 – 15	Very noticeable
15 – 20	Objectionable
Over 20	Very objectionable to intolerable

Source: Down and Stocks, 1978

### **3.8.2 Analysis**

A mini-excavator, rubber-tire backhoe, work truck, pavement saw, and various hand tools are the equipment to be used during installation of the PAA. The various equipment planned to be used for the PAA emit noise levels between 70 - 90 dBA at 45 feet.

Construction machinery would be operated for approximately ten hours a day four days a week, generating noise during the daytime (8am-6pm) when many residents are at work. Therefore, a reasonable exposure time of two hours would be expected during times which residents may be home during the day. Elevated noise levels are anticipated for approximately five months for the duration of the construction of the PAA. While the construction noise generated would be considered unacceptable according to HUD standards, these limited exposures and time intervals are still within allowable USACE safety levels (USACE 2003). Further, they are similar to typical neighborhood noise generated by gas powered lawnmowers in the local area, which could range from 90-95 dBA at three feet and 70-75 dBA at 100 feet. There could be an increase in noise levels during the construction period. However, the impact would be localized, temporary and should not approach nuisance levels. Due to daytime construction and the short and limited duration of elevated noise levels associated with the PAA, impacts from noise should be minor and temporary.

No impacts to noise would be anticipated to occur from the NAA.

### **3.9 Socioeconomic Conditions**

Under Executive Order 12898 “Federal Action to Address Environmental Justice in Minority Populations and Low Income Populations,” federal agencies are directed to identify, address, and avoid disproportionately high and adverse human health or environmental effects on minority and low income populations.



According to the U.S. Census Bureau, the 2010 population estimate for Mason County, West Virginia was 27,324 and does not contain significant minority populations. The 2010 census indicates that Mason County, West Virginia is 97.7% white and the 2009 census indicates that Mason County has a median family income of \$35,232 compared with \$37,423 for the state of West Virginia. Individuals residing in the county below the poverty level is 20.4% compared to 17.8% statewide.

Water service provided by the Town of Hartford Sewer Collection System will be readily available to all of the residential and commercial buildings in the project area. Presence of upgraded public sewers would increase local property values. The most immediate environmental effect would be an increase in the standard of living for residents in the project area. Over time, the positive effects of the project would spread into surrounding communities. No homes or buildings would be impacted by the proposed project. The proposed upgraded sewer collection system would equally serve all residents within the Town of Hartford. Further, project cost via user rates would be spread evenly to all customers of the sewer collection system. Therefore, the project meets the directive of EO 12898 by avoiding any disproportionately high adverse human health or environmental effects on minority or low income populations.

No impacts to minority and low income populations are anticipated to occur from the NAA.

### **3.10 Aesthetics**

Temporary disturbance of the local aesthetics is anticipated during construction of the PAA; however after the upgrades to the sewer collection system are complete, the contractor would be required to fill, re-grade, and reseed excavated sites to original conditions.

Under the NAA, the untreated and improperly treated wastewater from the current defective sewer collection system would continue to cause eutrophication of the local streams that could result in unsightly algal blooms negatively affecting aesthetic resources.

### **3.11 Transportation and Traffic**

Construction of the PAA will take place in road rights-of-way adjacent to WV County Route 62, County Route 4, and along various city streets. All road ways within the project area, except for County Routes 62 and 4, have average daily traffic (ADT) flow of less than 200 vehicles per day. A WV Department of Highways permit had been obtained for all work pertaining to the PAA within their rights-of-way. All traffic control, flagging, and signage will be in accordance with the Manual on Uniform Traffic Control Devices regulated by the Federal Highway Administration. Impacts anticipated to occur from the PAA would be minimal and temporary.

No impacts to transportation and traffic are anticipated to occur from the NAA.



### **3.12 Health and Safety**

The Town of Hartford has been under a WV DEP Administrative Order to correct deficiencies in their sewer collection system since February of 2008. This finding was upgraded to a Consent Order in May of 2010. The PAA has been designed to correct the deficiencies in the existing sewer collection system and alleviate the relative environmental concerns and the health threats.

Under the NAA current untreated and improperly treated wastewater would continue to negatively impact surface water and groundwater, causing health and safety concerns.

### **3.13 Cumulative Effects**

The USACE must consider the cumulative effects of the proposed project on the environment as stipulated in the National Environmental Policy Act (NEPA). Cumulative effects are "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such actions". Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR Part 1508.7 Council on Environmental Quality [CEQ] Regulations).

The cumulative effects analysis is based on the potential effects of the proposed project when added to similar impacts from other projects in the region. An inherent part of the cumulative effects analysis is the uncertainty surrounding actions that have not yet been fully developed. The CEQ regulations provide for the inclusion of uncertainties in the analysis and states that "when an agency is evaluating reasonably foreseeable significant adverse effects on the human environment. ...and there is incomplete or unavailable information, the agency shall always make clear that such information is lacking" (40 CFR 1502.22).

Temporal and geographical limits for this project must be established in order to frame the analysis. These limits can vary by the resources that are affected. The temporal limits for assessment of this impact would initiate in 1972 with the passage of the Clean Water Act and end in 2017 or five years after completion of this project. The upgrade of the sewer collection system will have temporary and insignificant impacts to the environment. The only resource that would show long term effects would be water quality.

The geographical extent for this project would be approximately two miles through the Town of Hartford, WV. Past and present impacts on water quality within this area are primarily development driven in the form of construction, roads, and effluents from the human community. The same stressors are anticipated to occur in the reasonably foreseeable future. The Clean Water Act established regulatory controls over development at both the federal and state levels. These regulatory controls aim to achieve attainment of water quality standards to support different uses of the water. The availability of federal funds through programs, such as the 571 Program, to assist communities with the installation and construction of water-related environmental infrastructure, resource protection, and development projects in West Virginia are an additional benefit.



The significance of this action on water quality will be both minimal and positive. Given the current programs that are in place for the foreseeable future, there is expected to be a positive cumulative effect on water quality.

#### **4.0 REQUIRED COORDINATION**

##### **4.1 Public Involvement**

This Draft EA, along with the Draft Finding of No Significant Impact (FONSI), will be circulated to the local community and local, state and federal governmental agencies with jurisdiction by law or special expertise for a 30-day review/comment period. A copy will be made available at the local New Haven Public Library and a will be notice published in the *Point Pleasant Register*. A mailing list of parties that will receive notice of this Draft EA has been included in Appendix C.

A public meeting was held on March 11, 2010 at the Town of Hartford City Hall for the proposed sewer collection system improvement project. Notice of the public meeting was published in the *Point Pleasant Register*. No opposition to the PAA was voiced at the meeting.

##### **4.2 Required Agency Coordination**

Coordination with federal, state, county, and local agencies has been conducted throughout the preparation of this report. The USFWS, WVDEP, NRCS, SHPO, and the Governor's Office for Local Development have all been asked to review the project for potential negative resource impacts. This Draft EA will be sent to interested agencies for review and comment. All correspondence letters can be found in Appendix B.

#### **5.0 CONCLUSION**

No significant adverse impacts have been identified with implementation and operation the upgraded sewer collection system for the Town of Hartford, WV. The construction would take place on previously disturbed land, with the majority of the construction in road right-of-ways, and the contractor would be required to fill, re-grade, and reseed excavated sites to original conditions. Health and safety as well as water quality benefits, would be realized immediately and cumulatively with project implementation.

Short term impacts associated with construction of the upgraded sewer collection system would be localized and minor with the use of BMPs. Some possible temporary negative impacts on the human environment could include noise, short term road closure, and aesthetics. However, these impacts would be temporary and insignificant when compared to the positive permanent impact the project would have on the local community's increased standard of living.

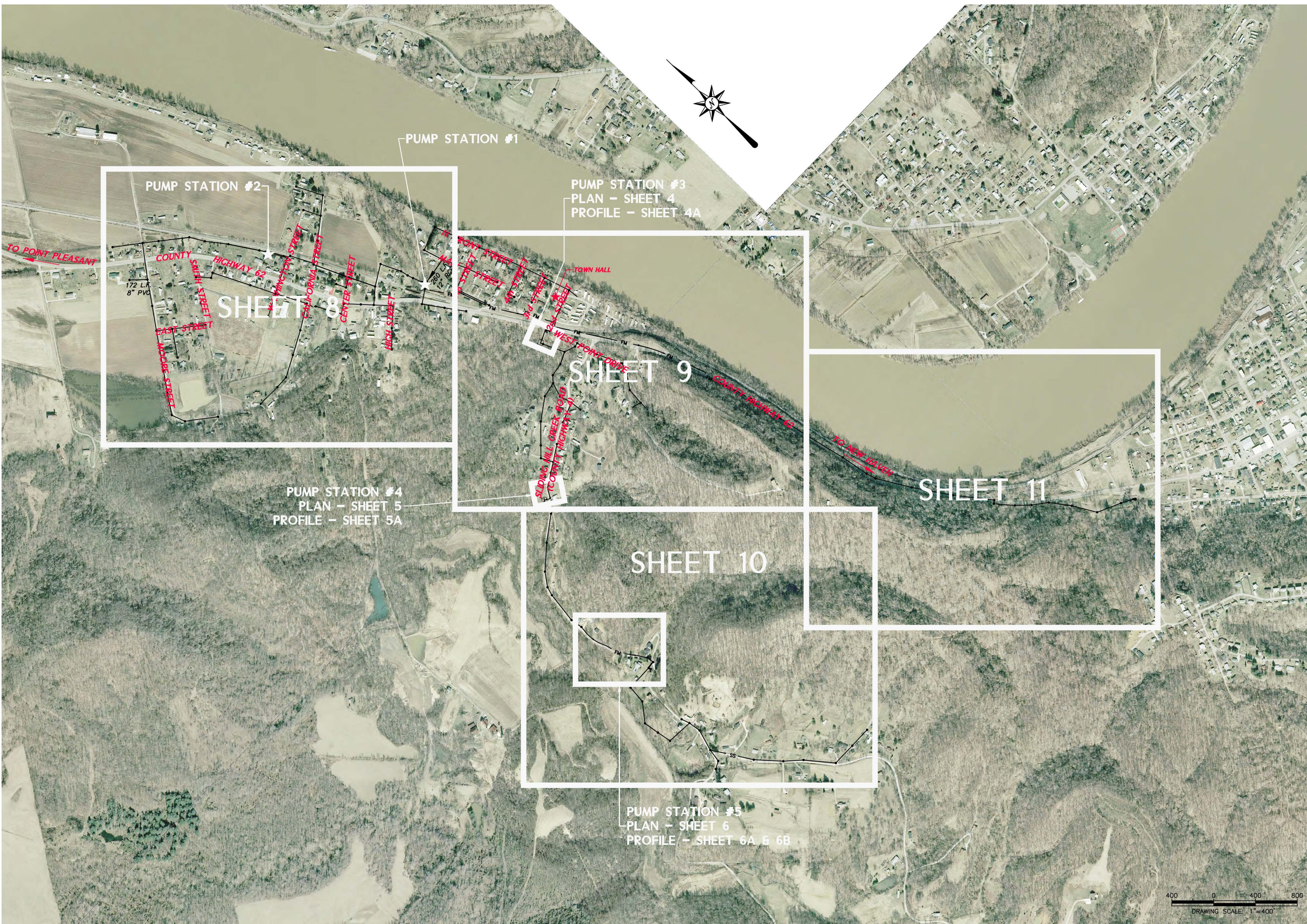


## 6.0 ACRONYM GLOSSARY

ADT – Average Daily Traffic	NRHP – National Register of Historic Places
BMP – Best Management Practices	NWI – National Wetlands Inventory
CR – County Route	PAA – Proposed Action Alternative
dB – Decibel	USACE – United States Army Corps of Engineers
dba – “A-weighted” decibel	USDA – United States Department of Agriculture
DNL – Day Night average noise Levels	USEPA – United States Environmental Protection Agency
EA – Environmental Assessment	WRDA – Water Resources Development Act
EO – Executive Order	WVDEP – West Virginia Department of Environmental Protection
EPA – United States Environmental Protection Agency	WVDNR – West Virginia Department of Natural Resources
FEMA – Federal Emergency Management Agency	WVDOT – West Virginia Department of Transportation
FIRM – Flood Insurance Rate Map	
FPPA – Farmland Protection Policy Act	
FWCA – Fish and Wildlife Coordination Act	
FWS – United States Fish and Wildlife Service	
GPD – Gallons Per Day	
HTRW – Hazardous, Toxic and Radioactive Waste	
NAA – No Action Alternative	
NAAQS – National Ambient Air Quality Standards	
NHPA – National Historic Preservation Act	
NRCS – Natural Resource Conservation Service	

## Appendix A





NO.	DATE	MADE BY	CHECKED	DESCRIPTION



CLIENT  
 TOWN OF HARTFORD  
 133 2nd STREET  
 HARTFORD, WV, 25253

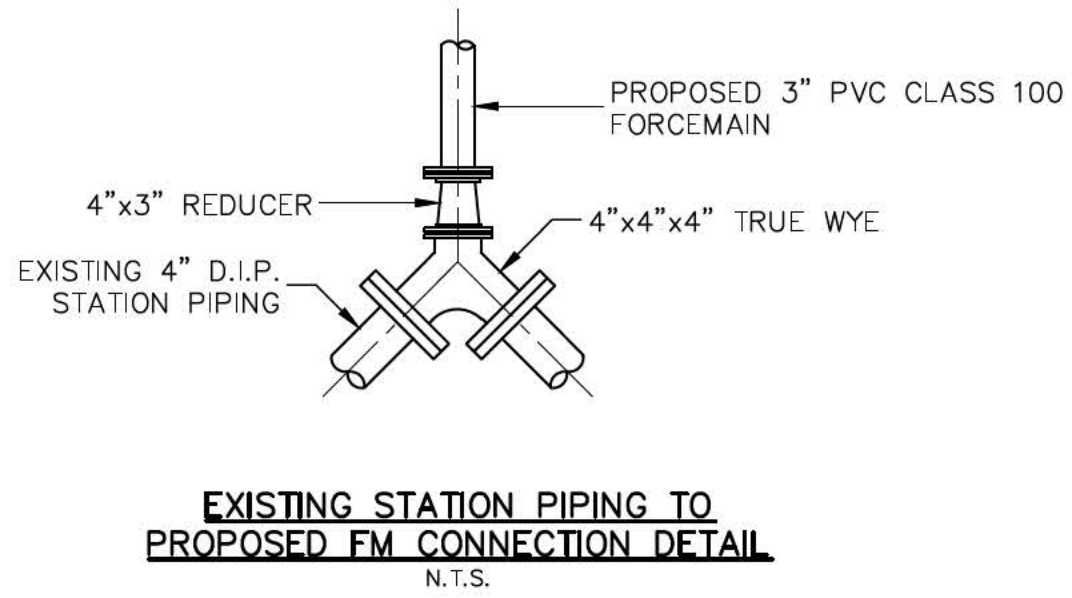
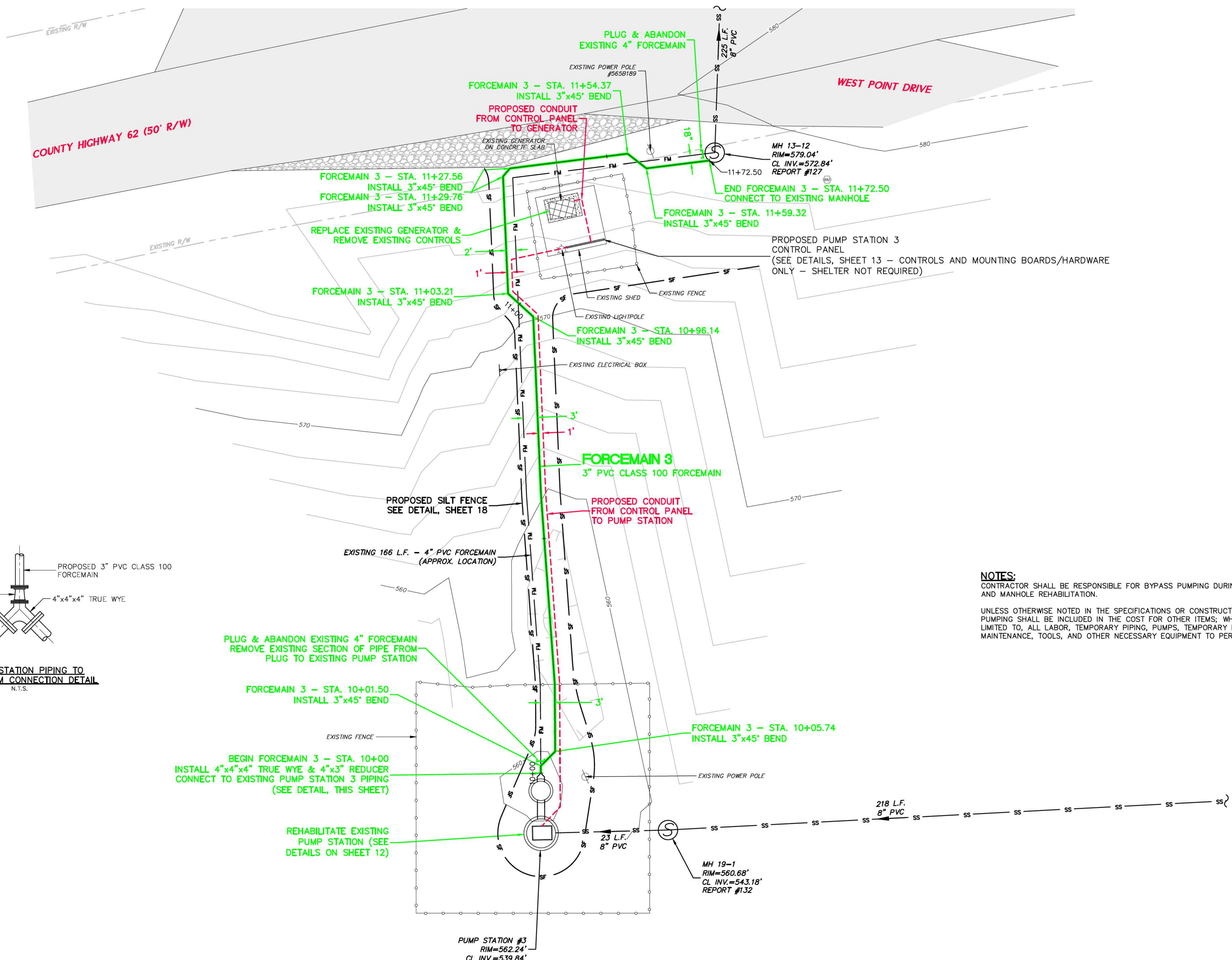
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 PUMPING SYSTEM IMPROVEMENTS  
 OVERALL SHEET INDEX

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CAD DWG FILE:	09_0417 INDEX
DRAWN BY:	JAK
CHECKED BY:	JER
APPROVED BY:	JER
DATE:	12/14/2010
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SHEET NO.	<b>3</b>

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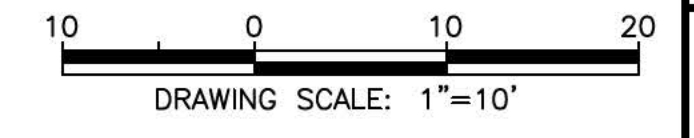


COUNTY HIGHWAY 62 (50' R/W)



**NOTES:**  
CONTRACTOR SHALL BE RESPONSIBLE FOR BYPASS PUMPING DURING PUMP STATION REHABILITATION AND MANHOLE REHABILITATION.

UNLESS OTHERWISE NOTED IN THE SPECIFICATIONS OR CONSTRUCTION DRAWINGS, ALL BYPASS PUMPING SHALL BE INCLUDED IN THE COST FOR OTHER ITEMS, WHICH SHALL INCLUDE, BUT NOT BE LIMITED TO, ALL LABOR, TEMPORARY PIPING, PUMPS, TEMPORARY LINE PLUGGING, FUEL, EQUIPMENT MAINTENANCE, TOOLS, AND OTHER NECESSARY EQUIPMENT TO PERFORM THE WORK.



MARK	DATE	MADE BY	CHECKED	DESCRIPTION

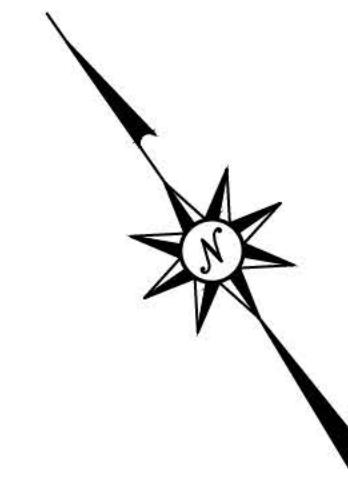
**TRIAD**  
TRIAD ENGINEERING, INC.  
4880 TEARS VALLEY ROAD  
SCOTT DEPOT, WV 26060  
BRIARCLIFF, WV 26034  
(304) 755-1800 FAX (304) 755-1801  
www.triadeng.com

TOWN OF HARTFORD  
133 2nd STREET  
HARTFORD, WV, 25253

**WASTEWATER COLLECTION & PUMPING SYSTEM IMPROVEMENTS**  
**PUMP STATION #3**  
**EXISTING CONDITIONS & PROPOSED IMPROVEMENTS**

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DRAWN BY:	JAK
CHECKED BY:	JER
APPROVED BY:	JER
DATE:	12/14/2010
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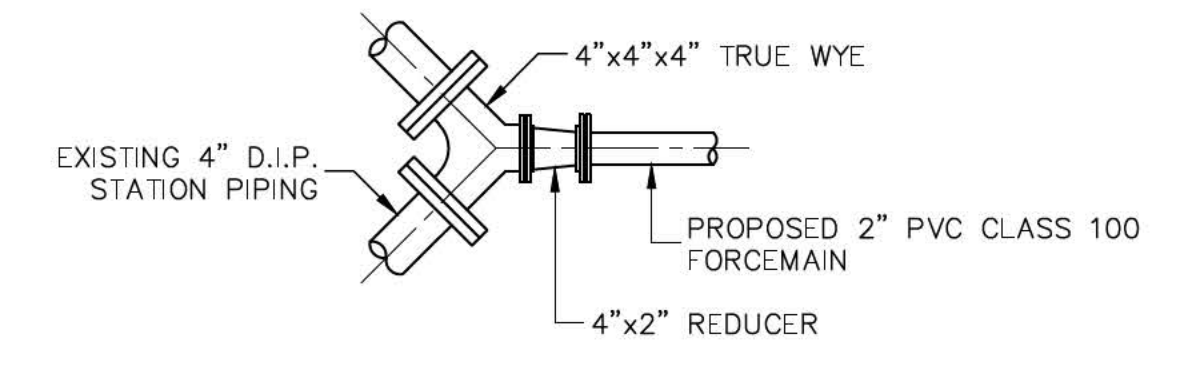
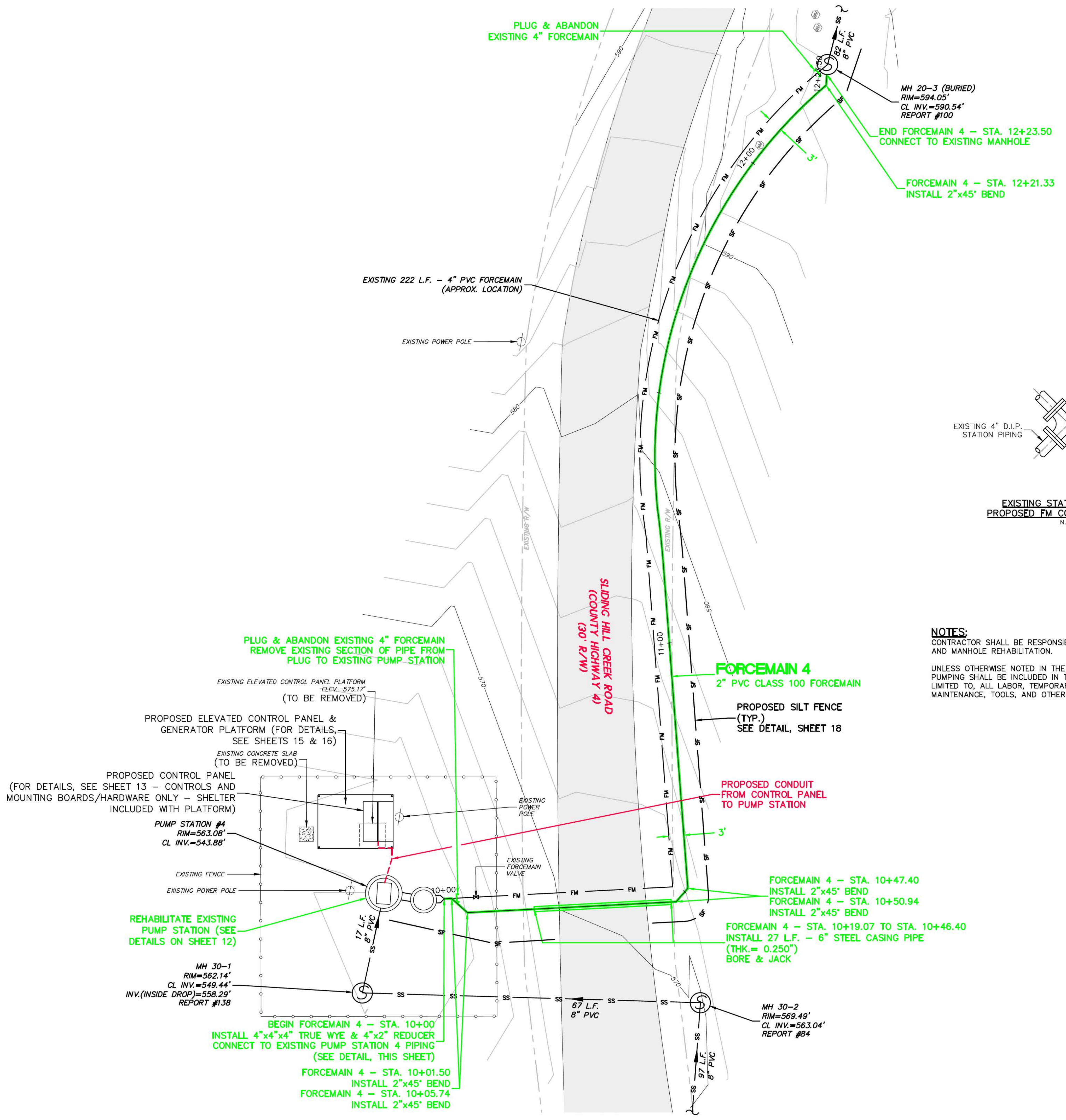


TOWN OF HARTFORD  
133 2nd STREET  
HARTFORD, WV, 25253

CLIENT

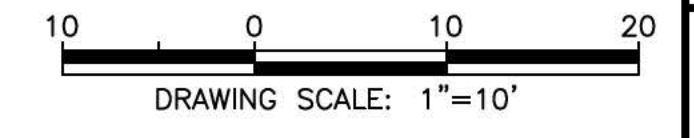
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PUMPING SYSTEM IMPROVEMENTS  
PUMP STATION #4  
EXISTING CONDITIONS & PROPOSED  
IMPROVEMENTS

PROJECT NO:	04-09-0417
CAD DWG FILE:	09_0417 PS
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APPROVED BY:	JER
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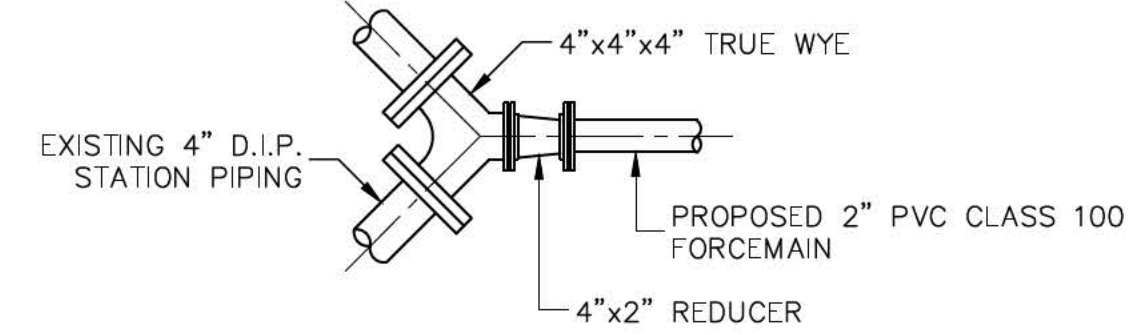


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N.T.S.

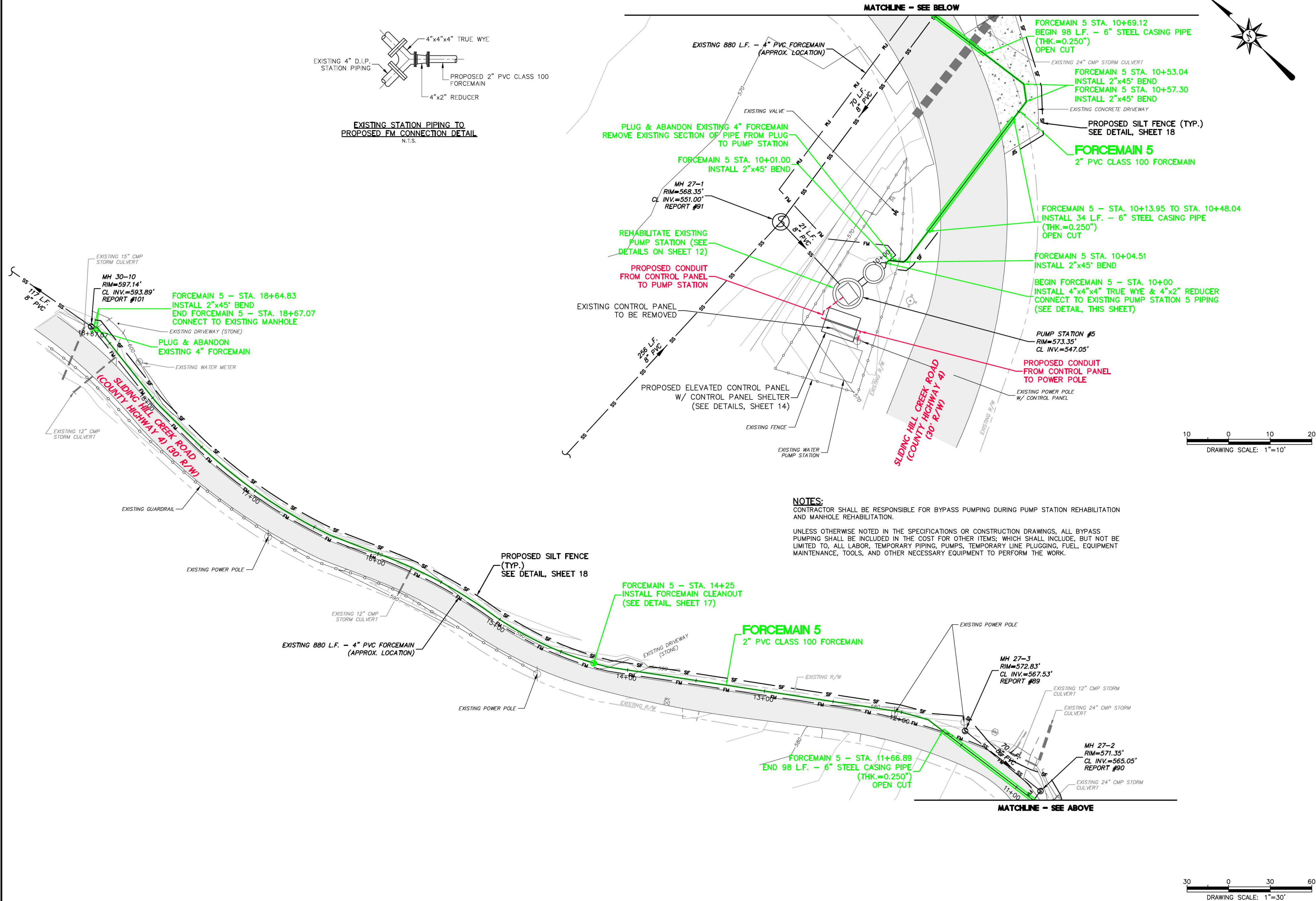
**NOTES:**  
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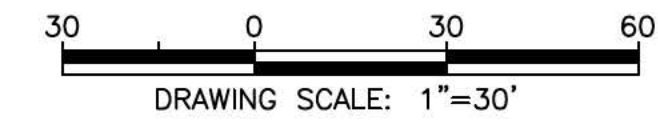
EXISTING STATION PIPING TO PROPOSED FM CONNECTION DETAIL  
N.T.S.



MATCHLINE - SEE BELOW



**NOTES:**  
CONTRACTOR SHALL BE RESPONSIBLE FOR BYPASS PUMPING DURING PUMP STATION REHABILITATION AND MANHOLE REHABILITATION.  
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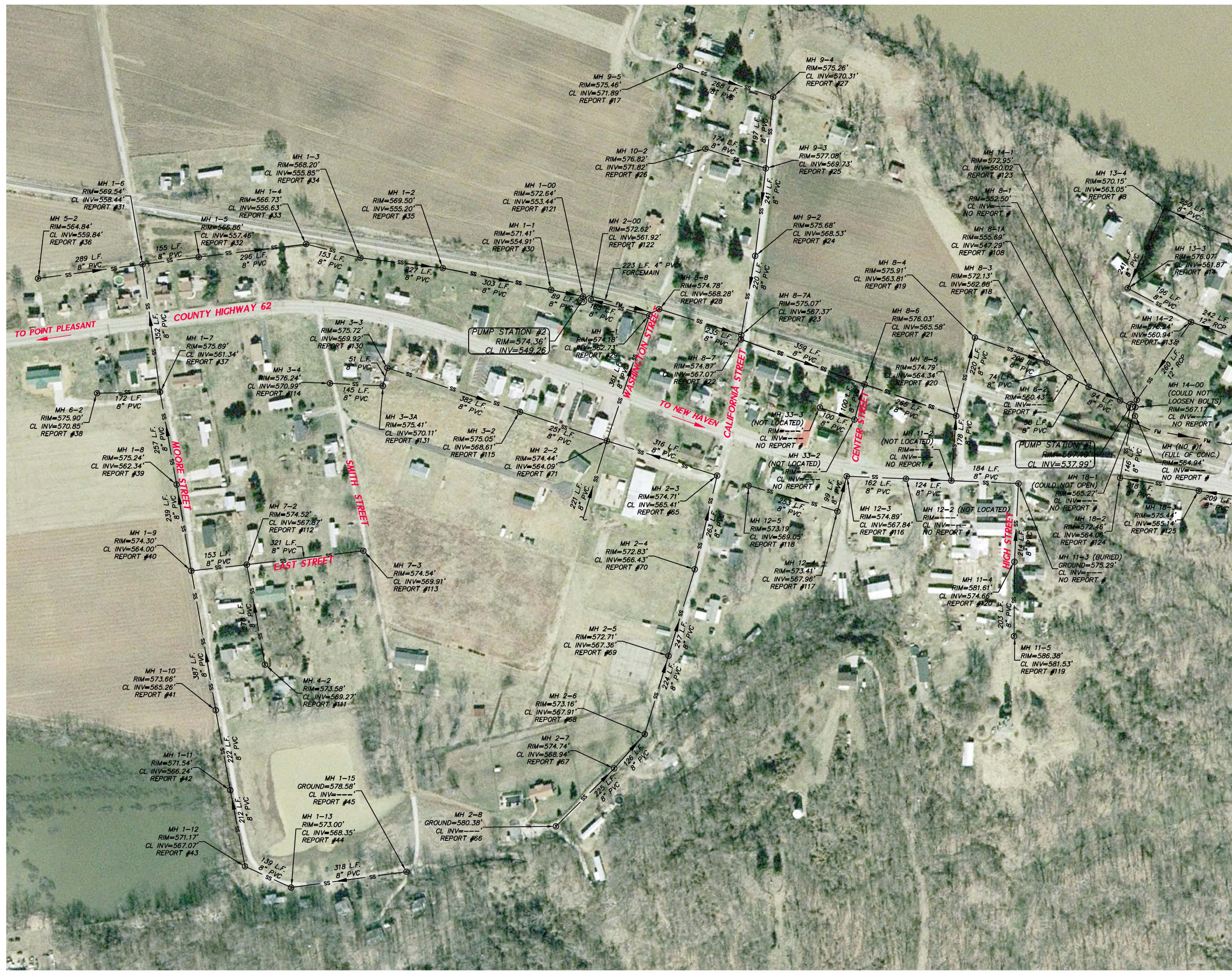
**TRIAD**  
TRIAD ENGINEERING, INC.  
4880 TEAR'S VALLEY ROAD  
SCOTT DEPOSIT, WV 26060  
PHONE: 756-560-1311  
FAX: 756-560-1312  
WWW.TRIADENG.COM

TOWN OF HARTFORD  
133 2nd STREET  
HARTFORD, WV, 25253

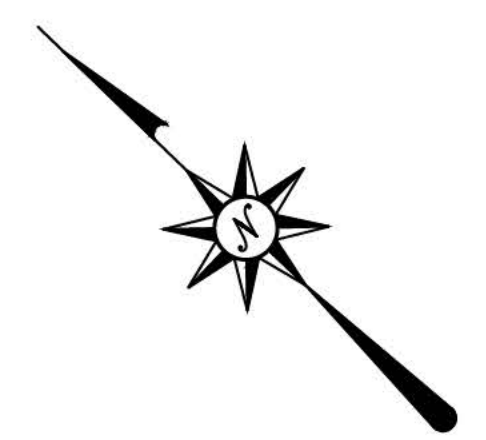
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EXISTING CONDITIONS & PROPOSED IMPROVEMENTS

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CHECKED BY:	JER
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MATCHLINE - SHEET 9



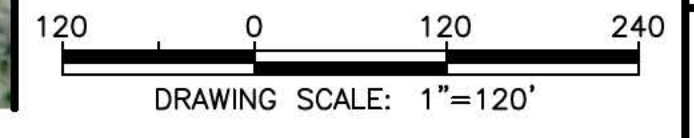
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**TRIAD**  
 TRIAD ENGINEERING, INC.  
 4880 TEARS VALLEY ROAD  
 SCOTT DEPOSIT, WV 26060  
 (304) 755-1800 FAX (304) 755-1801  
 www.triadeng.com

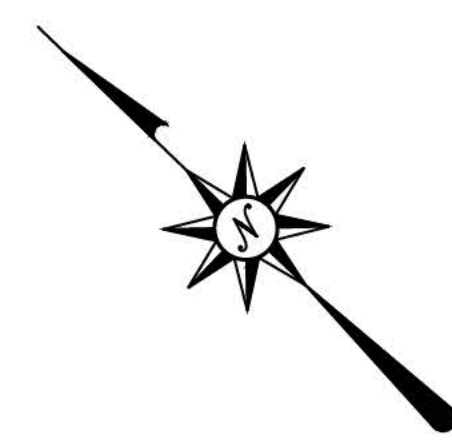
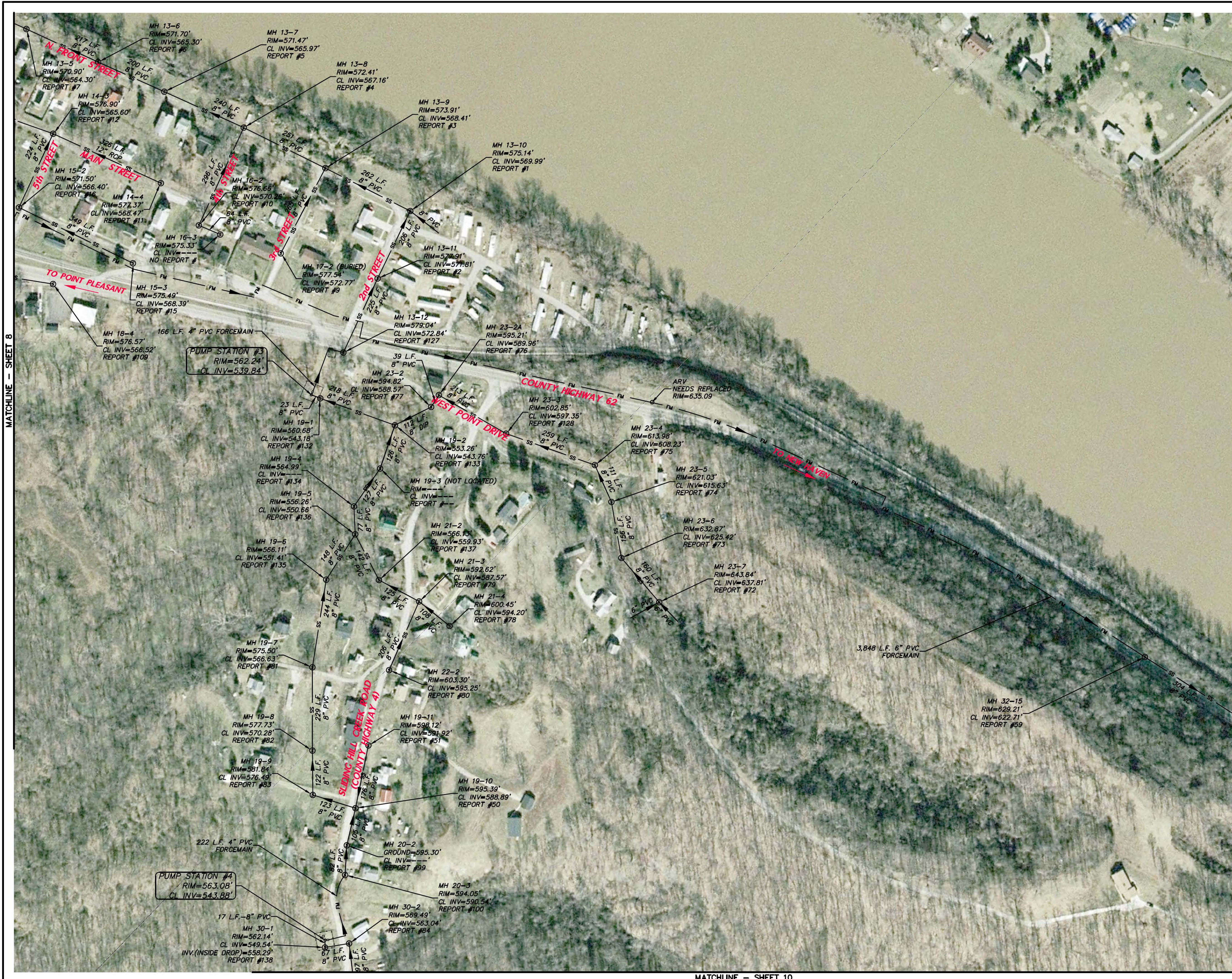
TOWN OF HARTFORD  
 133 2nd STREET  
 HARTFORD, WV, 25253

**WASTEWATER COLLECTION & PUMPING SYSTEM IMPROVEMENTS  
 MANHOLE INDEX PLAN SHEET**

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CHECKED BY:	JER
APPROVED BY:	JER
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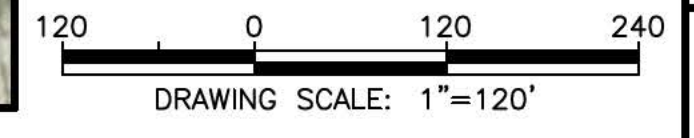




MATCHLINE - SHEET 8

MATCHLINE - SHEET 11

MATCHLINE - SHEET 10



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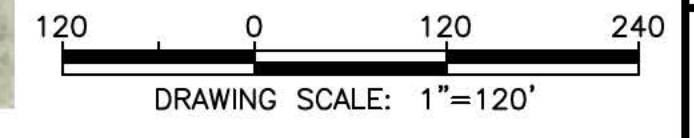
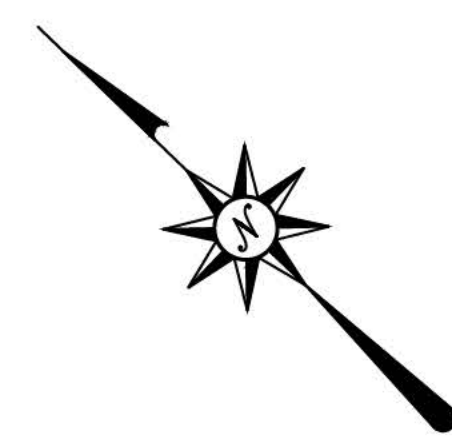
**TRIAD**  
 TRIAD ENGINEERING, INC.  
 4880 TEARS VALLEY ROAD  
 SCOTT DEPOSIT, WV 26060  
 PHONE: 756-680-1434  
 FAX: 756-680-1435  
 WWW.TRIADENG.COM

CLIENT  
 TOWN OF HARTFORD  
 133 2nd STREET  
 HARTFORD, WV, 26253

TITLE  
 WASTEWATER COLLECTION &  
 PUMPING SYSTEM IMPROVEMENTS  
 MANHOLE INDEX PLAN SHEET

PROJECT NO:	04-09-0417
CAD DWG FILE:	09_0417 DESIGN
DRAWN BY:	JAK
CHECKED BY:	JER
APPROVED BY:	JER
DATE:	12/14/2010
SCALE:	1"=120'
SHEET NO.	<b>9</b>





NO.	DATE	MADE BY	CHECKED	DESCRIPTION

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 4880 TEARS VALLEY ROAD  
 SCOTT DEPOUT, WV 26060  
 (304) 755-1800 FAX (304) 755-1801  
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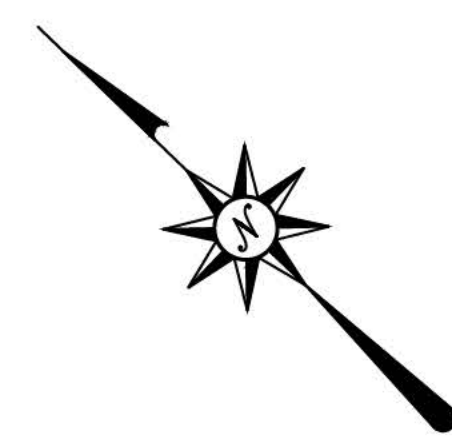
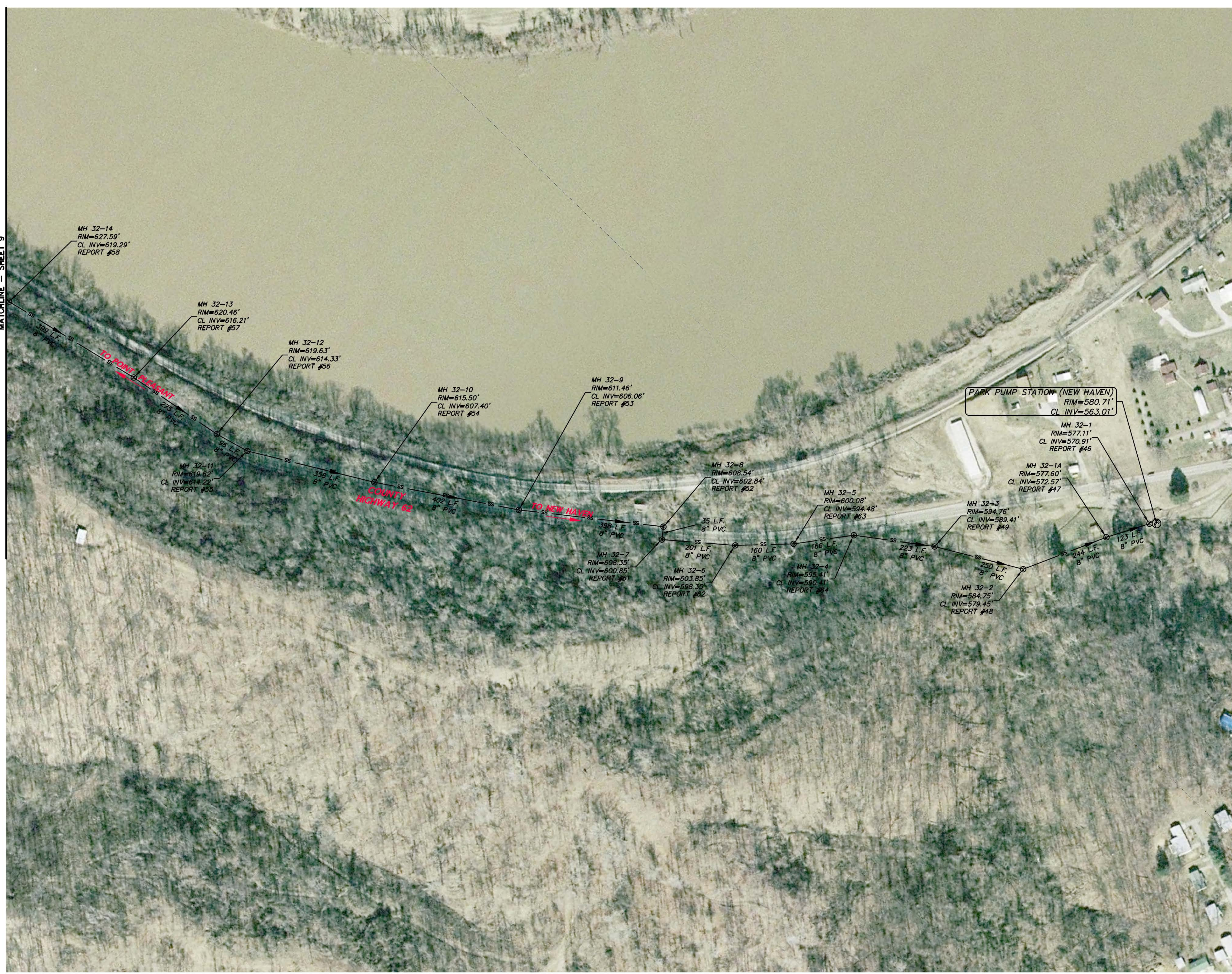
TOWN OF HARTFORD  
 133 2nd STREET  
 HARTFORD, WV, 25253

CLIENT  
 WASTEWATER COLLECTION & PUMPING SYSTEM IMPROVEMENTS  
 MANHOLE INDEX PLAN SHEET

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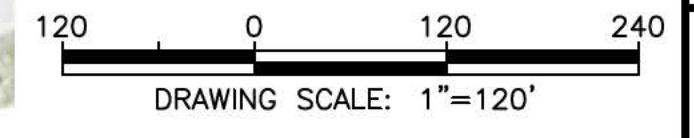
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**TRIAD**  
 TRIAD ENGINEERING, INC.  
 4880 TEARS VALLEY ROAD  
 SCOTT DEPOUT, WV 26060  
 (304) 755-1800 FAX (304) 755-1801  
 www.triadeng.com

TOWN OF HARTFORD  
 133 2nd STREET  
 HARTFORD, WV, 25253

WASTEWATER COLLECTION &  
 PUMPING SYSTEM IMPROVEMENTS  
 MANHOLE INDEX PLAN SHEET

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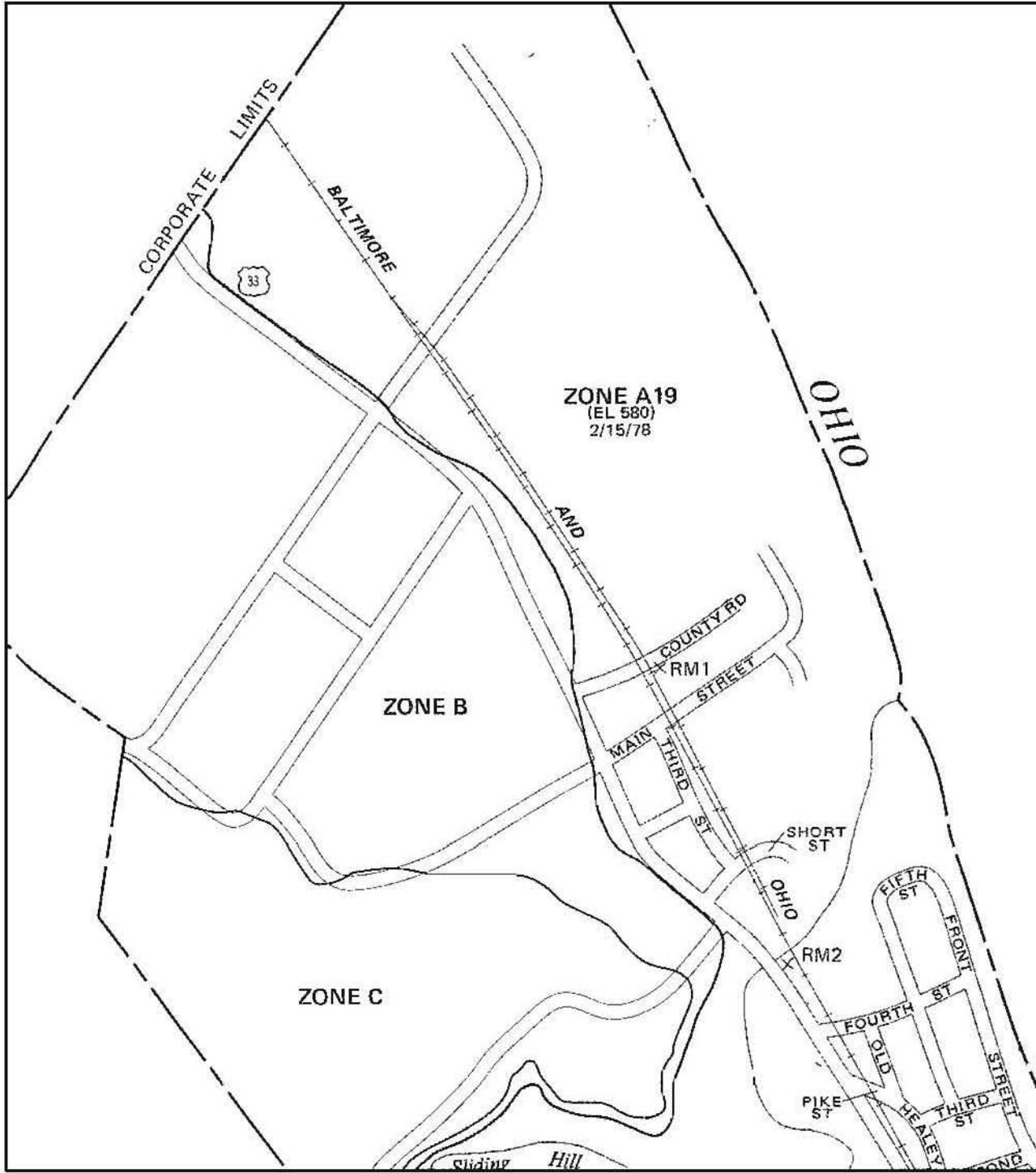
4980 TEAYS VALLEY ROAD  
SCOTT DEPOT, WV 25560

LOCATION MAP  
TOWN OF HARTFORD  
WASTEWATER SYSTEM IMPROVEMENTS  
HARTFORD, MASON COUNTY, WEST VIRGINIA

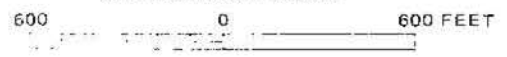
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CHECKED BY: JER  
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FIGURE NO.  
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APPROXIMATE SCALE



NATIONAL FLOOD INSURANCE PROGRAM

FLOOD INSURANCE RATE MAP

TOWN OF  
**HARTFORD,**  
**WEST VIRGINIA**  
MASON COUNTY

COMMUNITY-PANEL NUMBER  
540247 0001 A

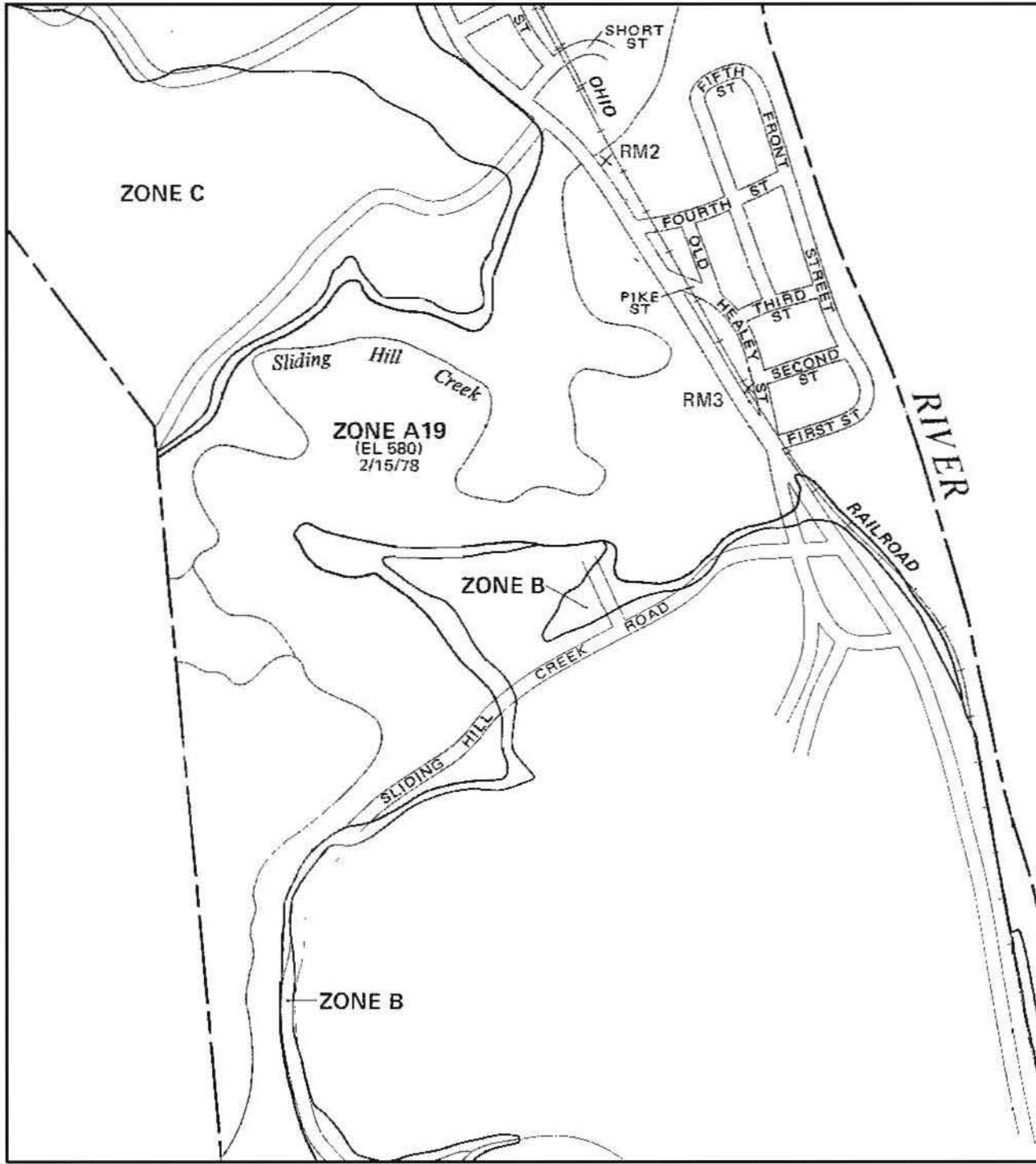
PAGE 1 OF 1

EFFECTIVE  
FEBRUARY 15, 1978



U.S. DEPARTMENT OF HOUSING  
AND URBAN DEVELOPMENT  
FEDERAL INSURANCE ADMINISTRATION

This is an official copy of a portion of the above referenced flood map. It was extracted using F-MIT On-Line. This map does not reflect changes or amendments which may have been made subsequent to the date on the title block. For the latest product information about National Flood Insurance Program flood maps check the FEMA Flood Map Store at [www.msc.fema.gov](http://www.msc.fema.gov)



APPROXIMATE SCALE



NATIONAL FLOOD INSURANCE PROGRAM

FLOOD INSURANCE RATE MAP

TOWN OF  
**HARTFORD,**  
**WEST VIRGINIA**  
 MASON COUNTY

COMMUNITY-PANEL NUMBER  
**540247 0001 A**

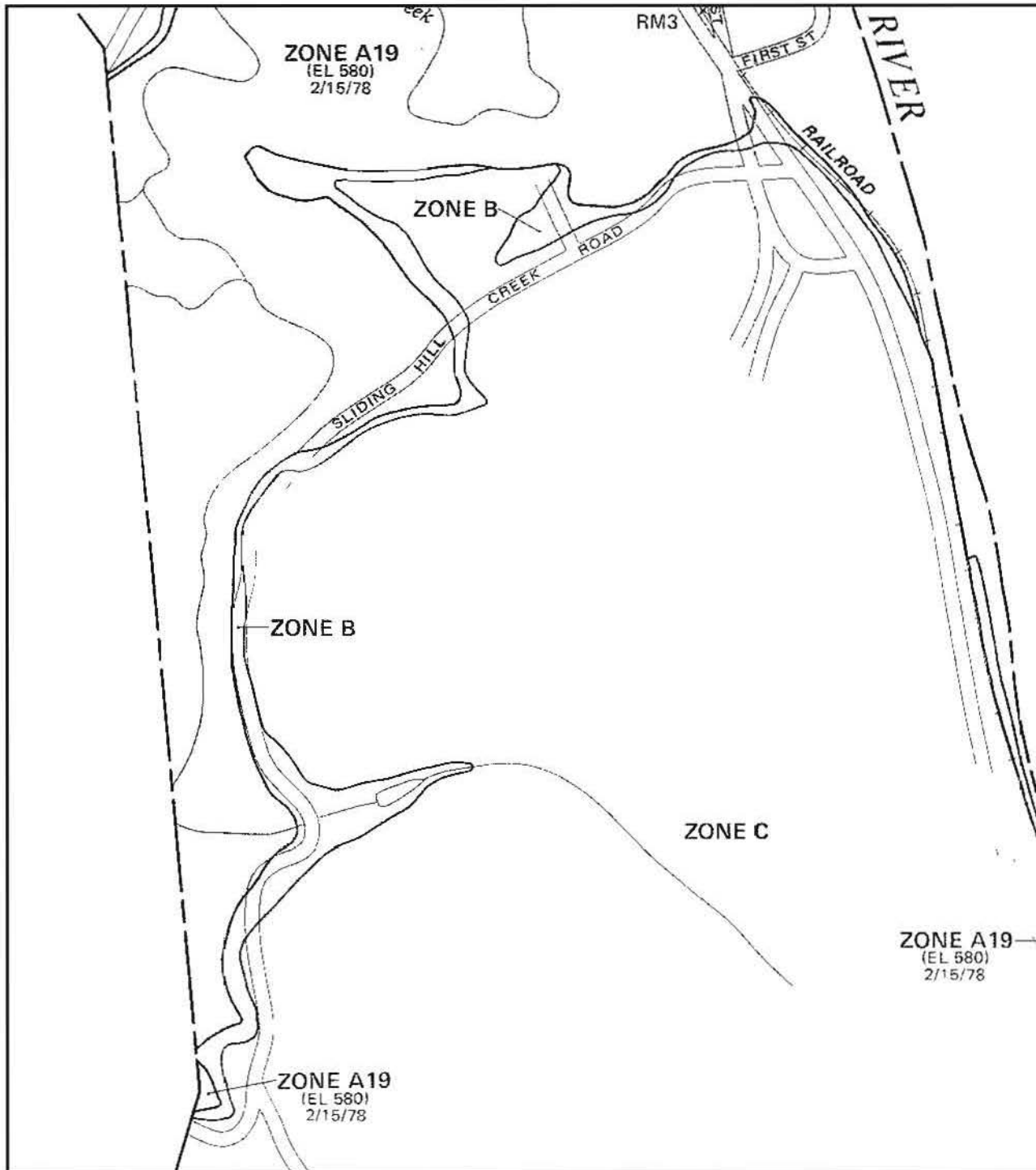
PAGE 1 OF 1

EFFECTIVE  
 FEBRUARY 15, 1978

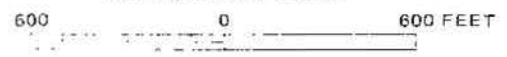


U.S. DEPARTMENT OF HOUSING  
 AND URBAN DEVELOPMENT  
 FEDERAL INSURANCE ADMINISTRATION

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APPROXIMATE SCALE



NATIONAL FLOOD INSURANCE PROGRAM

FLOOD INSURANCE RATE MAP

TOWN OF  
**HARTFORD,**  
**WEST VIRGINIA**  
 MASON COUNTY

COMMUNITY-PANEL NUMBER  
**540247 0001 A**

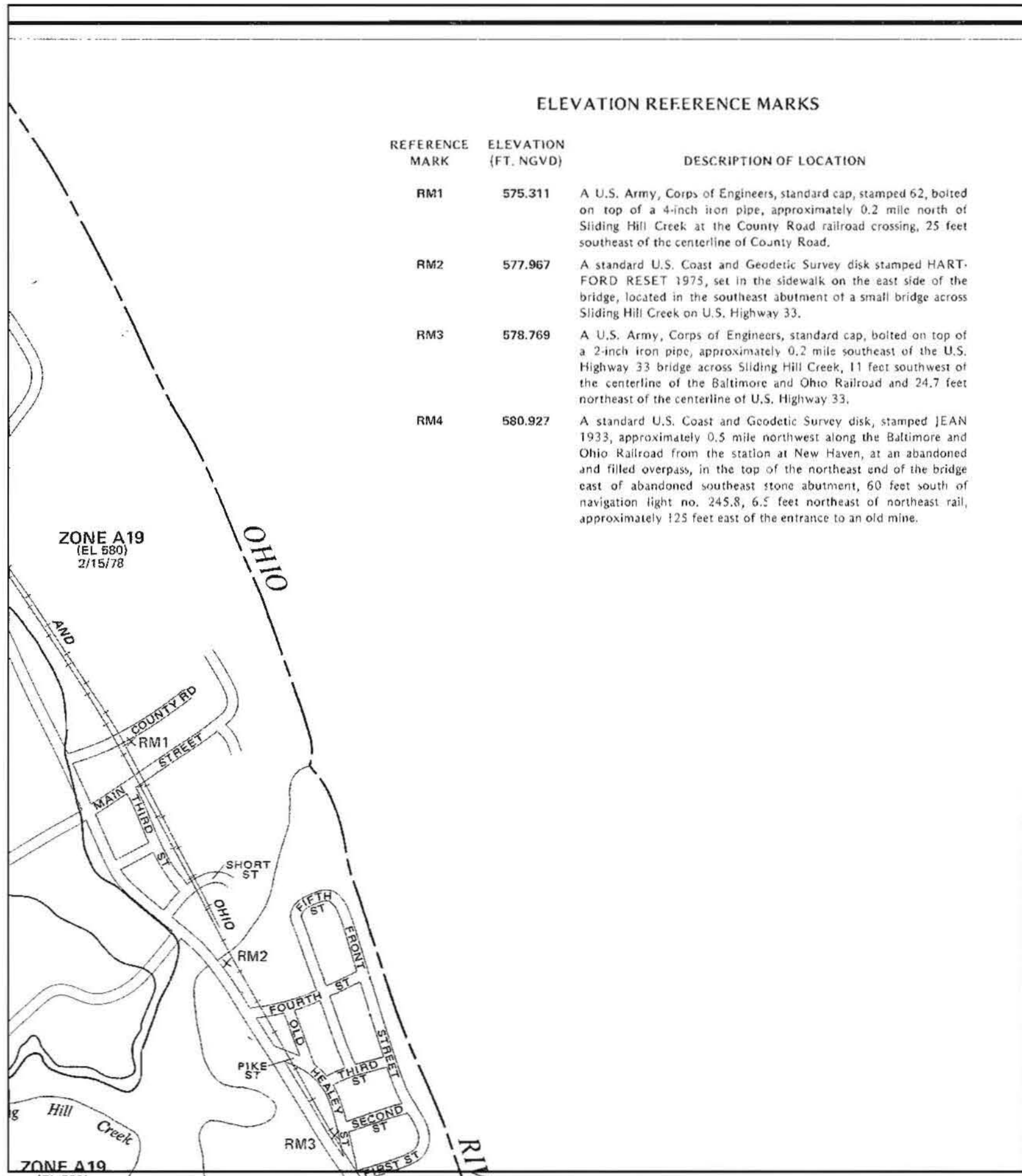
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EFFECTIVE  
 FEBRUARY 15, 1978



U.S. DEPARTMENT OF HOUSING  
 AND URBAN DEVELOPMENT  
 FEDERAL INSURANCE ADMINISTRATION

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### ELEVATION REFERENCE MARKS

REFERENCE MARK	ELEVATION (FT. NGVD)	DESCRIPTION OF LOCATION
RM1	575.311	A U.S. Army, Corps of Engineers, standard cap, stamped 62, bolted on top of a 4-inch iron pipe, approximately 0.2 mile north of Sliding Hill Creek at the County Road railroad crossing, 25 feet southeast of the centerline of County Road.
RM2	577.967	A standard U.S. Coast and Geodetic Survey disk stamped HARTFORD RESET 1975, set in the sidewalk on the east side of the bridge, located in the southeast abutment of a small bridge across Sliding Hill Creek on U.S. Highway 33.
RM3	578.769	A U.S. Army, Corps of Engineers, standard cap, bolted on top of a 2-inch iron pipe, approximately 0.2 mile southeast of the U.S. Highway 33 bridge across Sliding Hill Creek, 11 feet southwest of the centerline of the Baltimore and Ohio Railroad and 24.7 feet northeast of the centerline of U.S. Highway 33.
RM4	580.927	A standard U.S. Coast and Geodetic Survey disk, stamped JEAN 1933, approximately 0.5 mile northwest along the Baltimore and Ohio Railroad from the station at New Haven, at an abandoned and filled overpass, in the top of the northeast end of the bridge east of abandoned southeast stone abutment, 60 feet south of navigation light no. 245.8, 6.5 feet northeast of northeast rail, approximately 125 feet east of the entrance to an old mine.

### KEY TO MAP

500-Year Flood Boundary	-----	ZONE B
100-Year Flood Boundary	- - - - -	ZONE A1 DATE
Zone Designations* With Date of Identification e.g., 12/2/74		ZONE A5 DATE
100-Year Flood Boundary	- - - - -	ZONE B
500-Year Flood Boundary	-----	
Base Flood Elevation Line With Elevation In Feet**	-----573-----	
Base Flood Elevation in Feet Where Uniform Within Zone**		(EL 987)
Elevation Reference Mark		RM7x
River Mile		•M1.5

\*\* Referenced to the National Geodetic Vertical Datum of 1929

### \*EXPLANATION OF ZONE DESIGNATIONS

ZONE	EXPLANATION
A	Areas of 100-year flood; base flood elevations and flood hazard factors not determined.
A0	Areas of 100-year shallow flooding with depth from 1 to 3 feet; product of flood depth (feet) and velocity (feet per second) less than 15.
A1 - A30	Areas of 100-year flood; base flood elevations and flood hazard factors determined.
A99	Areas of 100-year flood to be protected by a flood protection system under construction; base flood elevations and flood hazard factors not determined.
B	Areas between limits of 100-year flood and 500-year flood; or areas of 100-year shallow flooding with depth less than 1 foot. (Medium shading)
C	Areas of minimal flooding. (No shading)
D	Areas of undetermined, but possible, flood hazards.
V	Areas of 100-year coastal flood with velocity (wave action); base flood elevations and flood hazard factors not determined.
V0	Areas of 100-year shallow flooding with velocity; depth from 1 to 3 feet; product of depth (feet) and velocity (feet per second) more than 15.
V1 - V30	Areas of 100-year coastal flood with velocity (wave action); base flood elevations and flood hazard factors determined.

### NOTES TO USER

Certain areas not in the special flood hazard areas (zones A and V) may be protected by flood control structures.

This map is for flood insurance purposes only; it does not necessarily show all areas subject to flooding in the community or all planimetric features outside special flood hazard areas.



APPROXIMATE SCALE

600 0 600 FEET

NATIONAL FLOOD INSURANCE PROGRAM

### FLOOD INSURANCE RATE MAP

TOWN OF  
**HARTFORD,**  
WEST VIRGINIA  
MASON COUNTY

COMMUNITY-PANEL NUMBER  
**540247 0001 A**

PAGE 1 OF 1

EFFECTIVE  
FEBRUARY 15, 1978



U.S. DEPARTMENT OF HOUSING  
AND URBAN DEVELOPMENT  
FEDERAL INSURANCE ADMINISTRATION

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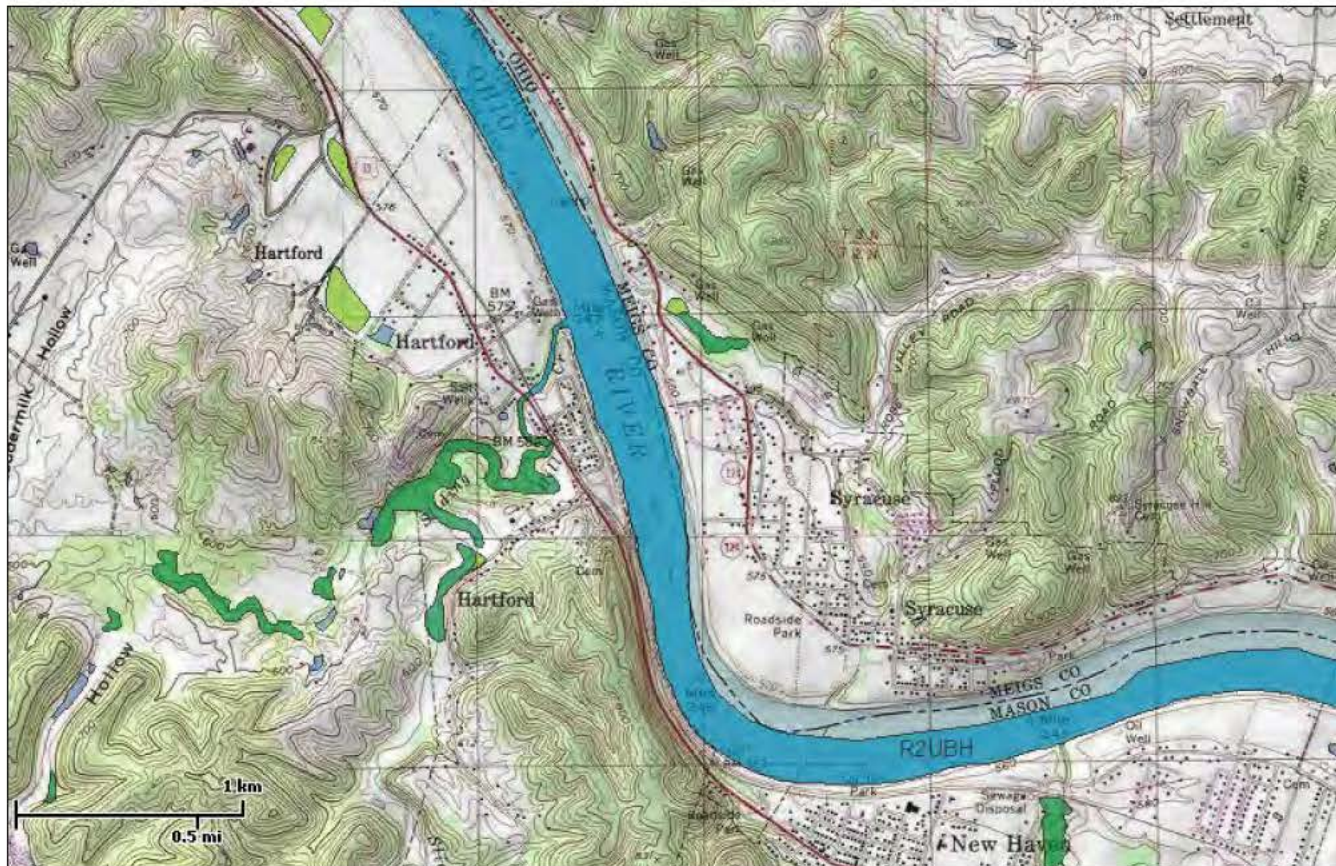




# U.S. Fish and Wildlife Service National Wetlands Inventory

## USGS Wetlands Inventory Map

Jan 23, 2012



### Wetlands

- Freshwater Emergent
- Freshwater Forested/Shrub
- Estuarine and Marine Deepwater
- Estuarine and Marine
- Freshwater Pond
- Lake
- Riverine
- Other

### Riparian

- Herbaceous
- Forested/Shrub

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

User Remarks:

## Appendix B

**CIVIL • ENVIRONMENTAL  
AND GEOTECHNICAL ENGINEERING**

4980 Teays Valley Road  
Scott Depot, WV 25560  
Phone 304.755.0721  
Fax 304.755.1880

**TRIAD**  
TRIAD ENGINEERING, INC.

September 18, 2009

WV Division of Culture and History  
The Culture Center  
1900 Kanawha Blvd. East  
Charleston, WV 25305-0300

**Subject:       Town of Hartford  
                  Preliminary Sewer Evaluation Study**

On behalf of the Town of Hartford, Triad Engineering Inc. would like to request an environmental clearance review for the Preliminary Sewer Evaluation Study described in this letter.

The scope of the project will include rehabilitation of the five (5) existing pump stations and approximately 130 manholes throughout the system. There will be very little, if any, excavation during the project. Most of the work will be done in-place. The possible exception would be if existing manholes need to be completely replaced. However, that work would be contained to the area of the existing manhole, which has already been distributed. Therefore, we are requesting an environmental clearance for the entire Town of Hartford.

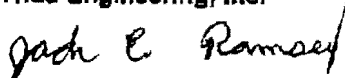
All construction areas will be located in previously disturbed areas. No underground sewer lines will be installed on this project.

Transmitted herewith, please find a copy of the proposed project location map. The Town of Hartford requests the assistance of your office in identifying historic properties that are listed or eligible for listing on the National Register of Historic Places and that may be affected by the project.

Should you discover unavoidable impacts, please provide comment on measures to mitigate or minimize those impacts. Should you require additional information, please contact the undersigned.

Sincerely,

**Triad Engineering, Inc.**



Jack E. Ramsey, PE  
Utilities Group Manager



CIVIL • ENVIRONMENTAL  
AND GEOTECHNICAL ENGINEERING

4980 Teays Valley Road  
Scott Depot, WV 25560  
Phone 304.755.0721  
Fax 304.755.1880



September 18, 2009

Chief Regulatory Branch  
US Army Corps of Engineers  
Huntington District  
502 Eight Street  
Huntington, WV 25701-2070

Attention: Mr. Mark Taylor

Dear Mr. Taylor:

**Subject: Town of Hartford  
Preliminary Sewer Evaluation Study**

On behalf of the Town of Hartford, Triad Engineering Inc. would like to request an environmental clearance review for the Preliminary Sewer Evaluation Study described in this letter.

The scope of the project will include rehabilitation of the five (5) existing pump stations and approximately 130 manholes throughout the system. There will be very little, if any, excavation during the project. Most of the work will be done in-place. The possible exception would be if existing manholes need to be completely replaced. However, that work would be contained to the area of the existing manhole, which has already been distributed. Therefore, we are requesting an environmental clearance for the entire Town of Hartford.

Transmitted herewith, please find a copy of the proposed project location map. No stream crossings are anticipated for this project. Please review for any impact on wetlands and the flood plain and provide the 25 and 100 year flood elevations for the project area. Should you discover unavoidable impacts, please provide comment on measures to mitigate or minimize those impacts. Should you require additional information, please contact the undersigned.

Sincerely,

Triad Engineering, Inc.

A handwritten signature in black ink that reads "Jack E. Ramsey".

Jack E. Ramsey, PE  
Utilities Group Manager

**CIVIL • ENVIRONMENTAL  
AND GEOTECHNICAL ENGINEERING**

4980 Teays Valley Road  
Scott Depot, WV 25560  
Phone 304.755.0721  
Fax 304.755.1880

**TRIAD**  
TRIAD ENGINEERING, INC.

September 18, 2009

WV Department of Environmental Protection  
601 57<sup>th</sup> Street, Southeast  
Charleston, WV 25304

Attention: Mr. Bill Timmermeyer

Dear Mr. Timmermeyer:

**Subject: Town of Hartford  
Preliminary Sewer Evaluation Study**

On behalf of the Town of Hartford, Triad Engineering Inc. would like to request an environmental clearance review for the Preliminary Sewer Evaluation Study described in this letter.

The scope of the project will include rehabilitation of the five (5) existing pump stations and approximately 130 manholes throughout the system. There will be very little, if any, excavation during the project. Most of the work will be done in-place. The possible exception would be if existing manholes need to be completely replaced. However, that work would be contained to the area of the existing manhole, which has already been distributed. Therefore, we are requesting an environmental clearance for the entire Town of Hartford.

Transmitted herewith, please find a copy of the proposed project location and hydric soils map. Please review for any impact on surface water to include wetlands and stormwater. Should you discover unavoidable impacts, please provide comment on measures to mitigate or minimize those impacts. Should you require additional information, please contact the undersigned.

Sincerely,

Triad Engineering, Inc.



Jack E. Ramsey, PE  
Utilities Group Manager

**To:** Timmermeyer, William F  
**Cc:** Jack E. Ramsey  
**Subject:**

Mr. Timmermeyer,

You have provided me with an environmental review for projects in the past, and I was hoping you could do the same for the Town of Hartford. We originally mailed the request over a year ago but have not received a response. I have attached the original letter requesting a review for impacts to wetlands and stormwater; however, I know you are the person who reviews projects for impacts from stormwater. I emailed Mr. Bennett a request for review on potential impacts to wetlands. Please review the information at your convenience and provide me with comments on potential impacts from stormwater. It is important we receive your review as soon as possible; therefore, if you could email it back to me rather than mail, I would greatly appreciate it. Please contact me with any questions or concerns.

Thank you,  
Amanda

Amanda M. Sutphin, PE  
Project Engineer  
Triad Engineering, Inc.  
4980 Teays Valley Road  
Scott Depot, WV, 25560  
Office No. 304-755-0721  
Fax No. 304-755-1880  
Cell No. 304-539-2542  
[asutphin@triadeng.com](mailto:asutphin@triadeng.com)  
Website: [www.triadeng.com](http://www.triadeng.com)

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AND GEOTECHNICAL ENGINEERING**

4980 Teays Valley Road  
Scott Depot, WV 25560  
Phone 304.755.0721  
Fax 304.755.1880



September 18, 2009

West Virginia Division of Natural Resources  
P.O. Box 67  
Elkins, WV 26241

Attention: Ms. Barbara Sargent

Dear Ms. Sargent:

**Subject: Town of Hartford  
Preliminary Sewer Evaluation Study**

On behalf of the Town of Hartford, Triad Engineering Inc. would like to request an environmental clearance review for the Preliminary Sewer Evaluation Study described in this letter.

The scope of the project will include rehabilitation of the five (5) existing pump stations and approximately 130 manholes throughout the system. There will be very little, if any, excavation during the project. Most of the work will be done in-place. The possible exception would be if existing manholes need to be completely replaced. However, that work would be contained to the area of the existing manhole, which has already been distributed. Therefore, we are requesting an environmental clearance for the entire Town of Hartford.

Transmitted herewith, please find a copy of the proposed project location map. Please review for any impact on rare, threatened, or endangered species. Should you discover unavoidable impacts, please provide comment on measures to mitigate or minimize those impacts. Should you require additional information, please contact the undersigned.

Sincerely,

Triad Engineering, Inc.

A handwritten signature in black ink that reads "Jack E. Ramsey".

Jack E. Ramsey, PE  
Utilities Group Manager

CIVIL • ENVIRONMENTAL  
AND GEOTECHNICAL ENGINEERING

4980 Teays Valley Road  
Scott Depot, WV 25560  
Phone 304.755.0721  
Fax 304.755.1880



September 18, 2009

U.S. Fish and Wildlife Service  
Region 5, Northeast  
Route 250 South, Elkins Shopping Plaza  
694 Beverly Pike  
Elkins, WV 26241

**Subject:       Town of Hartford  
                  Preliminary Sewer Evaluation Study**

On behalf of the Town of Hartford, Triad Engineering Inc. would like to request an environmental clearance review for the Preliminary Sewer Evaluation Study described in this letter.

The scope of the project will include rehabilitation of the five (5) existing pump stations and approximately 130 manholes throughout the system. There will be very little, if any, excavation during the project. Most of the work will be done in-place. The possible exception would be if existing manholes need to be completely replaced. However, that work would be contained to the area of the existing manhole, which has already been distributed. Therefore, we are requesting an environmental clearance for the entire Town of Hartford.

Transmitted herewith, please find a copy of the proposed project location map. Please review for any impact on rare, threatened, or endangered species. Should you discover unavoidable impacts, please provide comment on measures to mitigate or minimize those impacts. Should you require additional information, please contact the undersigned.

Sincerely,

Triad Engineering, Inc.

A handwritten signature in black ink that reads "Jack E. Ramsey". The signature is written in a cursive style with a large, prominent 'J' and 'R'.

Jack E. Ramsey, PE  
Utilities Group Manager

**Cole, Carlos - Ripley, WV**

---

**From:** Wigal, Ron - Morgantown, WV  
**Sent:** Tuesday, November 16, 2010 9:59 AM  
**To:** Cole, Carlos - Ripley, WV  
**Subject:** FW: Town of Hartford  
**Attachments:** ~~NRCS 9-18-09.pdf; Farmland Classification.pdf; Hartford Project Location Map.pdf~~

Carlos,

Attached, please find a request for potential farmland impacts that may result from the proposal for a sewage system for the Town Hartford in Mason County. You may respond to Ms. Sutphin as to whether the funding federal agency must submit an AD-1006. As always, please copy me with your response.

Thanks,

Ron W.

---

**From:** Amanda Sutphin [<mailto:asutphin@triadeng.com>]  
**Sent:** Monday, November 08, 2010 1:14 PM  
**To:** Wigal, Ron - Morgantown, WV  
**Cc:** Jack E. Ramsey  
**Subject:** Town of Hartford

Mr. Wigal,

As discussed last week, I have attached the letter with supporting information requesting an environmental review for impacts to important farmlands. Please contact me with any questions or concerns.

Thank you.

Amanda M. Sutphin, PE  
Project Engineer  
Triad Engineering, Inc.  
4980 Teays Valley Road  
Scott Depot, WV, 25560  
Office No. 304-755-0721  
Fax No. 304-755-1880  
Cell No. 304-539-2542  
[asutphin@triadeng.com](mailto:asutphin@triadeng.com)  
Website: [www.triadeng.com](http://www.triadeng.com)

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AND GEOTECHNICAL ENGINEERING

4980 Teays Valley Road  
Scott Depot, WV 25360  
Phone 304.755.0721  
Fax 304.755.1680

**TRIAD**  
TRIAD ENGINEERING, INC.

September 18, 2009

Ron Wigal  
Environmental Specialist  
Natural Resource Conservation Service  
75 High Street, Room 301  
Morgantown, WV 26505

**Subject: Town of Hartford  
Preliminary Sewer Evaluation Study**

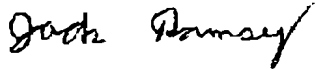
On behalf of the Town of Hartford, Triad Engineering Inc. would like to request an environmental clearance review for the Preliminary Sewer Evaluation Study described in this letter. The environmental clearance is the first step in complying with funding requirements. Triad is not requesting a farmland conversion impact rating. We are requesting a letter stating whether a farmland conversion impact rating will be required, or no further coordination with the Natural Resource Conservation Service is required.

The scope of the project will include rehabilitation of the five (5) existing pump stations and approximately 130 manholes throughout the system. There will be very little, if any, excavation during the project. Most of the work will be done in-place. The possible exception would be if existing manholes need to be completely replaced. However, that work would be contained to the area of the existing manhole, which has already been distributed. Therefore, we are requesting an environmental clearance for the entire Town of Hartford.

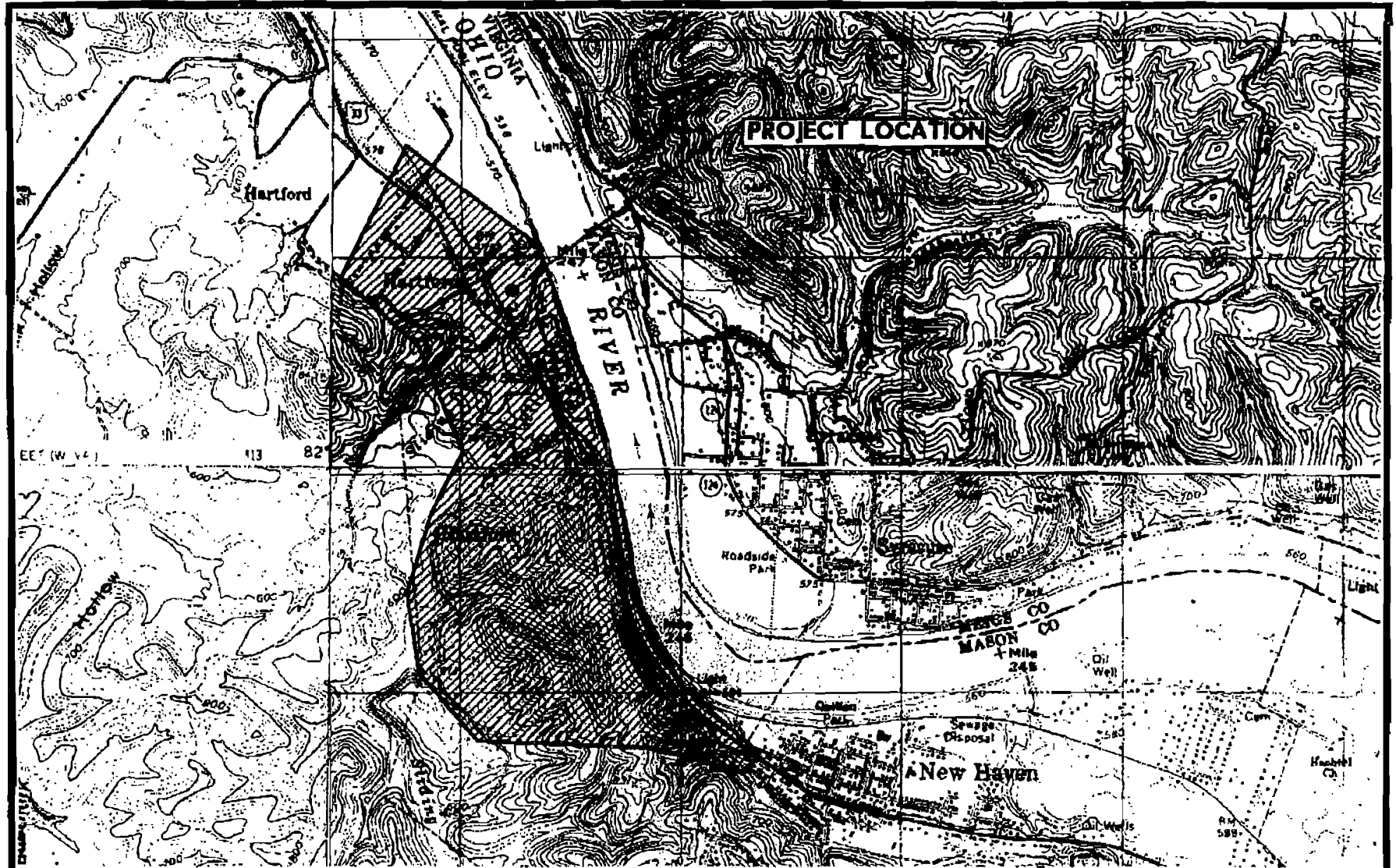
A project location map and farmland-classification map are enclosed with this letter to facilitate review. Please review for any impact on Important Farmlands. Should you have any questions or require additional information, please contact the undersigned.

Sincerely,

Triad Engineering, Inc.



Jack E. Ramsey, PE  
Utilities Group Manager



P.O. BOX 1438  
4680 TEAYS VALLEY ROAD  
ST. ALBANS, WV 25177

**SITE LOCATION MAP  
HARTFORD SEWER EVALUATION**

HARTFORD, WEST VIRGINIA

DRAWN BY: SJF  
CHECKED BY: JER  
SCALE: 1" = 2000'

FIGURE NO.

1





RECEIVED OCT 29 2009

The Culture Center

1900 Kanawha Blvd., E.

Charleston, WV 25305-0300

**Randall Reid-Smith, Commissioner**

Phone 304.558.0220 • www.wvculture.org

Fax 304.558.2779 • TDD 304.558.3562

EEO/AA Employer

October 23, 2009

Mr. Jack Ramsey  
Utilities Group Manager  
TRIAD Engineering, Inc.  
4980 Teays Valley Road  
Scott Depot, WV 25560

RE: Town of Hartford  
Preliminary Sewer Evaluation Study  
FR#: 09-1323-MS

Dear Mr. Ramsey:

We have reviewed the above referenced project to determine potential effects to cultural resources. As required by Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties," we submit our comments.

According to submitted information, Town of Hartford is proposing to rehabilitate five existing pump stations and approximately 130 existing manholes near Hartford, Mason County.

Architectural Resources:

It is our opinion that there are no architectural resources eligible for or included in the National Register of Historic Places that will be impacted by this project. No further consultation regarding architectural resources is necessary.

Archaeological Resources:

A search of office site files located no known archaeological sites within the proposed project area. Based on submitted information, it is our understanding that all of the proposed construction will occur within previously disturbed locations. In our opinion, there are no cultural resources located within the proposed project area that are eligible for or listed in the National Register of Historic Places. If, however, cultural materials are encountered during construction, all activity within the discovery area shall cease and our office shall be contacted immediately.

We appreciate the opportunity to be of service. *If you have questions regarding our comments or the Section 106 process, please contact Shirley Stewart Burns, Historian, or Kelly J. Ristau, Archaeologist, in the Historic Preservation Office at (304) 558-0240.*

Sincerely,

Susan M. Pierce  
Deputy State Historic Preservation Officer

SMP/SSB/KJR

## Kathy Kelley Elliott

---

**From:** Jack Ramsey [jramsey@triadeng.com]  
**Sent:** Thursday, November 18, 2010 11:00 AM  
**To:** kkelliott@ntelos.net  
**Subject:** FW: This is the Town of Hartford Environmental Clearance from the USACOE  
**Attachments:** WV NWP 12.pdf; \_Certification\_.txt

Corps of Engineers

-----Original Message-----

**From:** Amanda Sutphin [mailto:asutphin@triadeng.com]  
**Sent:** Monday, November 15, 2010 3:59 PM  
**To:** Jack E. Ramsey  
**Subject:** This is the Town of Hartford Environmental Clearance from the USACOE

-----Original Message-----

**From:** Kennedy, Noah J LRH [mailto:Noah.J.Kennedy@usace.army.mil]  
**Sent:** Monday, November 15, 2010 2:08 PM  
**To:** Amanda Sutphin  
**Subject:** RE: Town of Hartford; Environmental Clearance (UNCLASSIFIED)

**Classification:** UNCLASSIFIED  
**Caveats:** FOUO

Ms. Sutphin:

As per our discussions on the above referenced project, based on our review of your application, the project as described in your submittal meet the conditions for non-reporting Nationwide 12 utility line projects and as such do not require verification from this office prior to completing the proposed work. Please remember that work in Section 10 waterways or mechanized land clearing in forested wetlands would require notification to this office prior to performing work in those locations. It is your responsibility to insure that all work meets the terms and conditions of the Nationwide permit for utility lines.

If you have any questions or need any additional information please do not hesitate contacting our office. Thanks.

Noah J. Kennedy  
Regulatory Specialist  
South Regulatory Section  
USACE, Huntington District  
phone: (304)399-5710  
fax: (304)399-5085

**Amanda Sutphin**

---

**From:** Kennedy, Noah J LRH [Noah.J.Kennedy@usace.army.mil]  
**Sent:** Monday, November 15, 2010 2:08 PM  
**To:** Amanda Sutphin  
**Subject:** RE: Town of Hartford; Environmental Clearance (UNCLASSIFIED)



WV NWP 12.pdf  
(131 KB)

Classification: UNCLASSIFIED

Caveats: FOUO

Ms. Sutphin:

As per our discussions on the above referenced project, based on our review of your application, the project as described in your submittal meet the conditions for non-reporting Nationwide 12 utility line projects and as such do not require verification from this office prior to completing the proposed work. Please remember that work in Section 10 waterways or mechanized land clearing in forested wetlands would require notification to this office prior to performing work in those locations. It is your responsibility to insure that all work meets the terms and conditions of the Nationwide permit for utility lines.

If you have any questions or need any additional information please do not hesitate contacting our office. Thanks.

Noah J. Kennedy  
Regulatory Specialist  
South Regulatory Section  
USACE, Huntington District  
phone: (304)399-5710  
fax: (304)399-5085

-----Original Message-----

**From:** Amanda Sutphin [mailto:asutphin@triadeng.com]  
**Sent:** Monday, November 08, 2010 2:21 PM  
**To:** Kennedy, Noah J LRH  
**Cc:** Jack E. Ramsey  
**Subject:** Town of Hartford; Environmental Clearance

Noah,

We sent the original letter over a year ago to Mark Taylor but have not received a response. I have attached the original letter and project location map. It is important we get your response as soon as possible. If you no longer review projects for environmental clearance, please provide me with the contact information for the person who does.

Thank you for your help.

Amanda

Amanda M. Sutphin, PE

## Kathy Kelley Elliott

---

**From:** Jack Ramsey [jramsey@triadeng.com]  
**Sent:** Thursday, November 18, 2010 11:18 AM  
**To:** kkelliott@ntelos.net  
**Subject:** FW: Hartford Enviro DEP response regarding stormwater.  
**Attachments:** \_Certification\_.txt

This is all we got back from the ~~WV DEP~~. They stated that this will be their official clearance.

**From:** Amanda Sutphin [mailto:asutphin@triadeng.com]  
**Sent:** Thursday, November 18, 2010 11:03 AM  
**To:** Jack E. Ramsey  
**Subject:** Hartford Enviro DEP response regarding stormwater.

**From:** Timmermeyer, William F [mailto:William.F.Timmermeyer@wv.gov]  
**Sent:** Monday, November 08, 2010 2:35 PM  
**To:** Amanda Sutphin  
**Subject:** RE:

That area will fall in the Mid Ohio North TMDL. Don't know if those exact subwatersheds will be impaired or not and I'm not sure when they expect the TMDL to become final. But we can issue with a special condition that all line disturbance must be graded and seeded and mulch at the end of each working day.

**From:** Amanda Sutphin [mailto:asutphin@triadeng.com]  
**Sent:** Monday, November 08, 2010 2:26 PM  
**To:** Timmermeyer, William F  
**Subject:** RE:

Thank you.

---

**From:** Timmermeyer, William F [mailto:William.F.Timmermeyer@wv.gov]  
**Sent:** Monday, November 08, 2010 1:49 PM  
**To:** Amanda Sutphin  
**Subject:** RE:

Amanda,

I apologize if this one got missed placed. I see no reason why a construction stormwater permit could not be issued for this project. I will have my staff review the information in regards to Tier 3 and TMDL issues and get back to you with that determination.

Thanks,  
Bill

**From:** Amanda Sutphin [mailto:asutphin@triadeng.com]  
**Sent:** Monday, November 08, 2010 1:34 PM

**To:** Timmermeyer, William F  
**Cc:** Jack E. Ramsey  
**Subject:**

Mr. Timmermeyer,

You have provided me with an environmental review for projects in the past, and I was hoping you could do the same for the Town of Hartford. We originally mailed the request over a year ago but have not received a response. I have attached the original letter requesting a review for impacts to wetlands and stormwater; however, I know you are the person who reviews projects for impacts from stormwater. I emailed Mr. Bennett a request for review on potential impacts to wetlands. Please review the information at your convenience and provide me with comments on potential impacts from stormwater. It is important we receive your review as soon as possible; therefore, if you could email it back to me rather than mail, I would greatly appreciate it. Please contact me with any questions or concerns.

Thank you,  
Amanda

Amanda M. Sutphin, PE  
Project Engineer  
Triad Engineering, Inc.  
4980 Teays Valley Road  
Scott Depot, WV, 25560  
Office No. 304-755-0721  
Fax No. 304-755-1880  
Cell No. 304-539-2542  
[asutphin@triadeng.com](mailto:asutphin@triadeng.com)  
Website: [www.triadeng.com](http://www.triadeng.com)

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**Amanda Sutphin**

---

**From:** Reip, Wilma [Wilma.Reip@wv.gov]  
**Sent:** Tuesday, November 16, 2010 2:33 PM  
**To:** asutphin@triadeng.com  
**Subject:** Town of Hartford

Ms. Sutphin,

I have reviewed the information emailed to WVDEP-401 Certification Program, concerning the Preliminary Sewer Evaluation Study for the Town of Hartford. I recommend that you contact the US Army Corps of Engineers-Huntington District and they will determine if the project area has jurisdictional wetlands and if a 404 permit is required. After their determination is made, they will let you know if a State 401 Certification will be required. If you have further questions, contact me at (304) 926-0499 X1599.

Thank You,

Wilma Reip



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AND GEOTECHNICAL ENGINEERING

4980 Teays Valley Road  
Scott Depot, WV 25560  
Phone 304.755.0721  
Fax 304.755.1888



September 18, 2009

U.S. Fish and Wildlife Service  
Region 5, Northeast  
Route 250 South, Elkins Shopping Plaza  
694 Beverly Pike  
Elkins, WV 26241

RECEIVED  
SEP 22 2009  
WVFO

Subject: **Town of Hartford  
Preliminary Sewer Evaluation Study**

On behalf of the Town of Hartford, Triad Engineering Inc. would like to request an environmental clearance review for the Preliminary Sewer Evaluation Study described in this letter.

The scope of the project will include rehabilitation of the five (5) existing pump stations and approximately 130 manholes throughout the system. There will be very little, if any, excavation during the project. Most of the work will be done in-place. The possible exception would be if existing manholes need to be completely replaced. However, that work would be contained to the area of the existing manhole, which has already been distributed. Therefore, we are requesting an environmental clearance for the entire Town of Hartford.

Transmitted herewith, please find a copy of the proposed project location map. Please review for any impact on rare, threatened, or endangered species. Should you discover unavoidable impacts, please provide comment on measures to mitigate or minimize those impacts. Should you require additional information, please contact the undersigned.

Sincerely,

Triad Engineering, Inc.



United States Department of the Interior

FISH AND WILDLIFE SERVICE



West Virginia Field Office  
694 Beverly Pike  
Elkins, West Virginia 26241

In response to your letter above, we have made a "no effect" determination that the project will not affect federally-listed endangered or threatened species. Therefore no biological assessment or further section 7 consultation under the Endangered Species Act is required with the Fish and Wildlife Service. Should project plans change, or if additional information on listed and proposed species becomes available, this determination may be reconsidered.

Definitive determinations of the presence of waters of the United States, including wetlands, in the project area and the need for permits, if any, are made by the U.S. Army Corps of Engineers. They may be contacted at: Huntington District, Regulatory Branch, 502 Eighth Street, Huntington, West Virginia 25701, telephone (304) 399-5710.

*[Signature]*  
Reviewer's signature and date

*[Signature]* 10/2/09  
Field Supervisor's signature and date



RECEIVED SEP 25 2009

**DIVISION OF NATURAL RESOURCES**

**Wildlife Resources Section  
Operations Center  
P.O. Box 67**

**Elkins, West Virginia 26241-3235  
Telephone (304) 637-0245  
Fax (304) 637-0250**

**Joe Manchin III  
Governor**

**Frank Jezioro  
Director**

September 25, 2009

Mr. Jack E. Ramsey  
Triad Engineering, Inc.  
4980 Teays Valley Road  
Scott Depot, WV 25560

Dear Mr. Ramsey:

We have reviewed our files for information on rare, threatened and endangered (RTE) species and sensitive habitats for the area of the proposed preliminary sewer evaluation project for the Town of Hartford in Mason County, WV.

We have no known records of any RTE species or sensitive habitats within the project area. The Wildlife Resources Section knows of no surveys that have been conducted in the area for rare species or rare species habitat. Consequently, this response is based on information currently available and should not be considered a comprehensive survey of the area under review.

The information provided above is the product of a database search and retrieval. This information does not satisfy other consultation or permitting requirements for disturbances to the natural resources of the state. If your project will directly impact the waters of the state or cause a "take" of fish and/or wildlife, consultation may be required. Requests for WV wildlife agency consultation should be directed to Mr. Roger Anderson at the address given in the letterhead or by email at rogeranderson@wvdnr.gov. Database requests for information on RTE species and sensitive habitats should still be directed to me.

Thank you for your inquiry, and should you have any questions please feel free to contact me at the above number, extension 2048. Enclosed please find an invoice.

Sincerely,

A handwritten signature in black ink, appearing to read "Barbara Sargent", is written over the typed name.

Barbara Sargent  
Environmental Resources Specialist  
Wildlife Diversity Program

enclosure

S:\Monthly\Barb\Invoices\Triad.doc

RECEIVED NOV 22 2010

UNITED STATES  
DEPARTMENT OF  
AGRICULTURE

NATURAL RESOURCES  
CONSERVATION  
SERVICE

530 Freedom Road  
Ripley, WV 25271

November 18, 2010

Amanda Sutphin, PE  
Triad Engineering, Inc.  
4980 Teays Valley Road  
Scott Depot, WV 25560

Dear Ms. Sutphin:

The following is a response to your request about the Farmlands in the impact area of your project, the Town of Hartford, Sewer System Improvements Project in Mason County, West Virginia.

If this project is just the replacement of existing lines and the rehabilitation of the existing system, you will not be disturbing any new farmland. **This Project will not have an impact to any Prime, Statewide Important or Locally Important Farmlands, because the proposed project area has previously been disturbed. If this is the case you will not have to do a Farmland Determination or complete a Farmland Conversion Impact Rating (AD-1006 form) for this project area.**

If you have any questions about this information or need other soils information please let me know at 304-372-6351, ext. 113.

Sincerely,



Carlos Cole  
Resource Soil Scientist

cc: Valerie Hannon, NRCS District Conservationist  
Ron Wigal, NRCS Resource Conservationist

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February 7, 2012

Mrs. Cheryl Oldaker  
Floodplain Manager  
Town of Hartford  
PO Box 96  
Hartford, WV 25247

Jack E. Ramsey, P.E.  
Triad Engineering, Inc.  
4980 Teays Valley Road  
Scott Depot, WV 25560

**SUBJECT: Hartford Wastewater Collection System Improvements  
Floodplain Review**

Dear Mr. Ramsey:

I have reviewed the project location map and FEMA flood maps concerning the Hartford Wastewater Collection System Improvements. There appears to be no adverse impacts to floodplains as a result of this project. Further authorization will not be required; however, should the project scope change, this office should be notified.

If you have any questions or comments or require additional information, please contact our office.

Sincerely,

A handwritten signature in cursive script that reads "Cheryl Oldaker".

Mrs. Cheryl Oldaker  
Floodplain Manager  
Town of Hartford

## Appendix C



**Section 571 Town of Hartford, WV Sewer Collection System Improvement Project  
Draft Environmental Assessment  
Mailing List**

**Federal Agencies and Officials**

Honorable Joe Manchin  
United States Senate  
300 Virginia Street, East Suite 2630  
Charleston, West Virginia 25301

Honorable Jay Rockefeller  
United States Senate  
220 North Kanawha Street, Suite 1  
Beckley, West Virginia 25801

Honorable Nick Rahall  
Representative In Congress  
District 3  
109 Main Street  
Beckley, West Virginia 25801

U.S. Environmental Protection Agency  
Region III  
1060 Chapline Street  
Wheeling, West Virginia 26003

USDA Natural Resources Conservation  
Service  
West Virginia South Area Office  
465 Ragland Road  
Beckley, West Virginia 25801

Ms. Deborah Carter, Field Supervisor  
United States Fish and Wildlife Service  
West Virginia Field Office  
694 Beverly Pike  
Elkins, West Virginia 26241

**State Agencies and Officials**

Honorable Earl Ray Tomblin  
Governor of West Virginia  
1900 Kanawha Boulevard, East  
Charleston, West Virginia 25305

County Commission of Mason County  
200 6<sup>th</sup> Street  
Point Pleasant, West Virginia 25550

Ms. Susan Pierce  
State Historic Preservation Office  
The Culture Center, Capitol Complex  
1900 Kanawha Blvd East  
Charleston, West Virginia 25305

Barbara Sargent, Environmental Resource  
Specialist  
West Virginia Division of Natural  
Resources  
P.O. Box 67  
Elkins, West Virginia 26241

West Virginia Department of Environmental  
Protection  
Division of Water and Waste Management  
601 57th Street  
Charleston, West Virginia 25304

**County Agencies and Officials**

New Haven Public Library  
P.O. Box 417  
New Haven, West Virginia 25265

**Municipal Agencies and Officers**

Honorable Sam Anderson  
Mayor of Hartford City  
133 2<sup>nd</sup> Street  
Hartford City, West Virginia 25265

**Civil and Environmental Engineering  
Consultants**

Jack E. Ramsey  
Triad Engineering, Inc.  
4980 Teays Valley Road  
Scott Depot, West Virginia 25560

## Appendix D

CELRH-EC-CE (1110)

01 August 2012


Wolfe/5327

*gw*

MEMORANDUM FOR CELRH-PM-PP-P (Attention: Steve Porter)

SUBJECT: QC review of the July 31, 2012 e-mail Addendum to the December 2011 Phase I Environmental Site Assessment for the Town of Hartford Wastewater Collection System Improvements, Hartford, Mason County, WV.

1. The above referenced addendum was reviewed by EC-CE and was determined to be acceptable. No further HTRW investigation is necessary at this time.
2. If you have any questions or further comments, please contact Janet Wolfe at x5327.



WYATT H. KMEN

Chief, Environmental and Remediation Section