

**State of Vermont**  
**Construction Section**  
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*Agency of Transportation*

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Harper T Callahan  
Kubricky Construction Corporation  
269 Ballard Road  
Wilton, VT 12831

November 18, 2014

**RE: RUTLAND CITY BRF 3000(16) CONTRACTOR EROSION PREVENTION AND  
SEDIMENT CONTROL PLAN**

Dear Harper:

VTrans has completed its review of the Contractor Erosion Prevention and Sediment Control (EPSC) Plan received via SharePoint on November 14th, 2014. The Plan is not considered acceptable at this time.

I have made comments on the attachment labeled "*Rutland City BRF3000(16)EPSC Plan 20141117*". In addition I have the following comments:

- The Plan should be comprehensive and should include the narrative, existing conditions, construction conditions and final conditions. In addition all EPSC detail sheets should be included. This would demonstrate to VTrans and to VT DEC that you have a complete and comprehensive approach of maintaining permit compliance.
- You are planning on working during the winter months as defined by VTrans and as defined by VT DEC. This project has a Moderate Risk Construction General Permit which requires limiting disturbance to only those areas with which you need. The project site is prone to flooding so keeping your footprint small would be a wise choice especially during the spring runoff period. For this reason I would suggest not installing EPSC measures or delineation until you plan to work in those particular areas. For example you are proposing to remove the existing bridge starting September 25, 2015. It would be beneficial to hold off installing delineation and EPSC measures around the abutment and approach until you are ready to do that work.
- Breaking out your sequencing into separate layout sheets could more clearly show means and methods as well as how you are limiting your footprint.
- Please list the qualifications for your On-Site Plan Coordinator as stipulated in the VTrans EPSC Contractor Checklist and Special Provision 652.06.
- Your schedule doesn't mention developing the approach on River Street from 104+00 to 106+00 LT until August of 2015. What specifically will you be doing in order to access and construct the Pier and Abutment #2? Will you be using this area for equipment storage? Show a footprint

and what you will use for material. This is not to be confused with a Stabilized Construction Entrance.

- If you wish to work outside the limits of work as shown in the Contract plans you must follow specification 105.23 to address any additional permits needed, amend the current permits and seek permission from the appropriate landowners to include the State of Vermont.
  
  - **Permits:**
    - The **Corps of Engineers Permit** requires that you file the Work Start Notification form (located in the Contract). Has this been done? Please ensure that the Engineer is copied on any correspondence with regulators.
    - The **VT DEC Construction General Permit** was handed out to you at the Pre-Construction Conference on September 29<sup>th</sup>. The cover letter has several bullets that direct you to certain documents you must have in order to be compliant with the permit. Please ensure you have these documents on-project. It also directs you to post the Notice of Authorization on a public board. Please ensure this has been done prior to work starting.
      - Requires that you file Notice of Addition of Operators To Coverage form.
      - You must fill out and submit to me the Notification of On-Site Coordinator. I will sign it and forward it on to VT DEC.
      - In order to be compliant with VT Water Quality Standards you must be able to prove any discharge water that leaves the site is within those standards. This will require you to have a Turbidity meter on-site.
      - The submitted Plan indicates using the VTrans generated inspection report. This project requires the use of VT DEC generated form specific to Moderate Risk Projects.
      - It will be important that the EPSC Plan be up to date and that all forms and documents are readily available should VT DEC visit the site.
    - The **VT DEC Title 19 (Stream Alterations Permit)** requires an on-site visit with the River Management Engineer. This is scheduled for November 19<sup>th</sup>. It may be a good idea to not only address the Pier work but also the stone fill work for the Pier, Abutment #1 and the existing bridge substructure removal. The causeway plan must be submitted to the River Management Engineer by specification 900.645 Temporary Causeway (Br 2).
    - This project has a **VT DEC Stormwater Permit**. It is not included in the Contract but the Contract plans detail how the stormwater infrastructure is to be built. The infrastructure includes swales that have a very specific geometry. You must construct the swales as detailed in the plans. If you find discrepancies in the plans please coordinate with the Engineer to resolve them.
  
  - **Off-Site Activities**
    - The Elnick Aggregate property you have proposed for wasting material may have an ACT 250 permit, but you must verify with the owner that they can accept waste material. This has been an issue lately and it would be in your best interest to ensure they can
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- indeed accept your material. You don't want ACT 250 enforcement coming after you.
- The forms you have submitted are not complete and it must be clear what sites you are referencing.
  - The **EPSC Plan Sheet** you provided does not provide the level of detail to demonstrate your means and methods to ensure permit compliance.
    - Pier: You are proposing a temporary casing for the new pier to isolate the work. This would potentially minimize your impacts to the river, so your EPSC measures should reflect that.
    - Abutment 1: The limits of your cofferdam must be included in the EPSC Plan to verify that it is within the Contracted limits. Due to the depth and size of the cofferdam needed to construct the abutment and wingwalls it is not likely that a filter bag will be an adequate treatment for dewatering. Please propose an alternative measure with appropriate supporting information to accommodate dewatering treatment of the cofferdam. This should include an appropriate footprint.
    - Existing River Street Bridge: There is mention of a causeway to access the pier of the existing bridge. You will need to submit additional details showing the needed footprint and elevation of the causeway. In addition how will you contain debris for span 2?
  - The Schedule as submitted has conflicts such as placing stone fill around substructures after steel has been set. This may have precipitated due to the Title 19 Stream Alterations permit conditions, but you must move other line items that stone fill work impacts.
    - My comments specific to the schedule in no way accepts or denies your schedule.

Based on the number of comments I have generated it may be appropriate to have a meeting to discuss them and establish a better line of communication for you to understand the States expectations when it comes to environmental aspects of this project. I am planning to attend the Title 19 River Management Engineer meeting on-site scheduled for November 19th at 11:00A.M. This may be a good opportunity to discuss my comments.

If you have any questions, please contact me at (802) 828-5483.

Sincerely,



William Farley P.E., CPESC

VTrans Assistant Construction Environmental Engineer

cc: Tim Pockette, VTrans Resident Engineer  
Mark Mackintosh, VTrans SW Regional Engineer  
Carolyn Carlson, VTrans Consultant Project Manager  
Andrea Wright, VTrans Construction Environmental Engineer  
Project File

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