## **Categorical Exclusion and Extraordinary Circumstances Review Form**

United States Environmental Protection Agency

Washington, DC 20460

I. General Information	
Project Name	WIFIA Id Number
Water and Wastewater Infrastructure Renewal Program	20102MA

Borrower Name

Springfield Water and Sewer Commission

Project Description

The Renewal Program is made up 26 projects categorized into main project groups including the Springfield Regional Wastewater Treatment Facility Projects, Cobble Mountain Reservoir Hydroelectric Station, the West Parish Filters, the Provin Mountain Reservoir Projects, Wastewater Collection and Water Distribution Pipe Inspection and Rehabilitation Projects, and others. See attached detailed project list.

Project Location Description (*street address/city/state/ZIP code; site characteristics*)

Projects are located in Hampden County, Massachusetts, throughout the service area. The SRWWTF is located at 250 M St, Agawam, MA 01001. The Cobble Mountain Hydroelectric Station is located in Granville, MA. West Parish Filters Water Treatment Plant is located in Westfield, MA. Provin Mountain Reservoir, Agawam, MA. See attached detailed project list.

II. EPA Contact for Environmental Review on this Project (If different from Responsible Official)			
Name	Title	Phone Number	
Alaina McCurdy	Environmental Scientist	202-564-6996	

**III.A. Categorical Exclusion Eligibility** (*Check YES or NO*) Complete the following questions in their entirety to determine if the project is eligible for a Categorical Exclusion (CATEX) pursuant to 40 CFR § 6.204(a)(1)(ii). Additionally, supporting statements and documentation can be included in Attachment 1.

If yes to any,	Does the project involve actions relating to existing infrastructure systems (e.g., sewer systems;
CATEX applies	drinking water supply systems; and stormwater systems, including combined sewer overflow systems)
	and involve:

	YES	NO		
	$\boxtimes$		Minor upgrading	
			Minor expansion of system capacity or rehabilitation (including functional replacement) of the existing system and its components (such as the sewer collection network and treatment system; the system to collect, treat, store and distribute drinking water; and stormwater systems, including combined sewer overflow systems)	
		$\boxtimes$	Construction of new minor ancillary facilities next to or on the same property as existing facilities	
If yes to any,	Will th	e projec	include actions that:	
CATEX does	YES	NO		
not apply		$\boxtimes$	Involve new or relocated discharges to surface or ground water	
			Will likely result in the substantial increase in the volume or the loading of pollutant to the receiving water	
		$\boxtimes$	Will provide capacity to serve a population 30% greater than the existing population	
		$\boxtimes$	Are not supported by the state, or other regional growth plan or strategy	
			Directly or indirectly involve or relate to upgrading or extending infrastructure systems primarily for the purpose of future development	

Project Name	WIFIA Id Number
Water and Wastewater Infrastructure Renewal Program, Springfield WSC	20102MA

**III.B. Extraordinary Circumstances** (Check YES or NO) Complete the following questions in their entirety to determine if the project involves any of the following extraordinary circumstances which would make it ineligible for a CATEX pursuant to 40 CFR § 6.204(b)(1) through (b)(10). Additionally, supporting statements and documentation can be included in Attachment 1.

YES	NO		
	$\boxtimes$	<ol> <li>Is the action known or expected to have potentially significant environmental impacts on quality of the human environment either individually or cumulatively over time?</li> </ol>	the
		2) Is the action known or expected to have disproportionately high and adverse human healt environmental effects on any community, including minority communities, low-inc communities, or federally-recognized Indian tribal communities?	h or ome
	$\square$	3) Is the action known or expected to significantly affect federally listed threatened or endang species or their critical habitat?	ered
		4) Is the action known or expected to significantly affect national natural landmarks or any proposition with naturally significant historic, architectural, prehistoric, archaeological, or cultural value including but not limited to, property listed on or eligible for the National Register of Hist Places?	oerty alue, toric
	$\boxtimes$	5) Is the action known or expected to significantly affect environmentally important nar resource areas such as wetlands, floodplains, significant agricultural lands, aquifer rech zones, coastal zones, barrier islands, wild and scenic rivers, and significant fish or wildlife hab	tural arge itat?
	$\boxtimes$	6) Is the action known or expected to cause significant adverse air quality effects?	
		7) Is the action known or expected to have a significant effect on the pattern and type of land (industrial, commercial, agricultural, recreational, residential) or growth and distributio population, including altering the character of existing residential areas or may not be consis with state or local government, or federally-recognized Indian tribe approved land use plan federal land management plans?	l use n of stent ns or
	$\boxtimes$	8) Is the action known or expected to significantly cause significant public controversy a potential environmental impacts of the proposed action?	bout
	$\square$	9) Is the action known or expected to be associated with providing financial assistance to a fee agency through an interagency agreement for a project that is known or expected to potentially significant environmental impacts?	deral have
	$\boxtimes$	10) Is the action known or expected to conflict with federal, state, or local government, or feder recognized Indian tribe environmental resource-protection, or land-use laws or regulations?	ally-

Title of Project	WIFIA Id Number
Water and Wastewater Infrastructure Renewal Program, Springfield WSC	20102MA

**III.C. Extraordinary Circumstances Statement** (*Check ONLY ONE box*) If the responses to Section III.A indicate the project is CATEX eligible, and if a **NO** response was recorded for each of the questions in Section III.B, then no Extraordinary Circumstances are present pursuant to 40 CFR § 6.204(b) and one of the following statements should be selected.

- 1) No extraordinary circumstances apply to the proposed action pursuant to 40 CFR §§ 6.204(a)(1) and 6.204(b). This statement is based on either past experience with similar actions at the proposed action site resulting in a CATEX and/or information gathered as part of previous NEPA or environmental due diligence review conducted at the proposed action site. Provide any supporting documentation or references in Attachment I.
- A statement and supporting documentation is attached explaining why no extraordinary circumstances exist or apply to the proposed action pursuant to 40 CFR §§ 6.204(a)(1) and 6.204(b).

## IV. NEPA Review Determination and Responsible Official Signature

Sections I through III must be completed to satisfy EPA's documentation requirements for CATEX eligibility. If completion of this form indicates that a CATEX *does apply*, the Responsible Official must sign below.

**Categorical Exclusion Determination** The EPA finds that the proposed action is eligible for exclusion from detailed environmental review under 40 CFR § 6.204(a)(1)(ii), and will not involve any of the extraordinary circumstances delineated under 40 CFR § 6.204(b)(1) through (b)(10). Consequently, the EPA will not prepare an environmental impact statement or an environmental assessment for the proposed project. The EPA may revoke this categorical exclusion if changes in the proposed action render it ineligible for exclusion or if new evidence emerges which indicates that serious local or environmental issues exist or federal, state, or local laws would be violated.

As the Responsible Official, I have determined that **this action is eligible for a Categorical Exclusion** per the substantive environmental review requirements under EPA regulations at 40 CFR § 6.204. Section III.C of this form has been completed providing the required Extraordinary Circumstances Statement.

	Director of Office of Wastewater Management	
Signature of Responsible Official	Title	Date

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## Attachment 1. CATEX Eligibility and/or Extraordinary Circumstances Statement(s)

The space below may be used for a statement and supporting documentation explaining CATEX eligibility why no extraordinary circumstances exist or apply to the proposed action pursuant to 40 CFR §§ 6.204(a)(1) and 6.204(b). Attach additional pages as needed.

An official endangered species list was prepared for all projects. For the Springfield Regional Wastewater Treatment Facility Projects, Cobble Mountain Reservoir Hydroelectric Station Projects, and the West Parish Filters Water Treatment Plant Projects, the only federally-listed species near the project locations is the Northern Long-eared Bat. For the Provin Mountain Reservoir Projects and the Water Distribution System Main Replacement Program and Sewer Rehabilitation Projects, the species list included the Northern Long-eared Bat and the Small Whorled Pogonia. For the Mill Locust Transfer Project, the species list indicated that no listed species are expected to occur at the project location. As habitat for the small whorled pogonia does not occur within the project area, EPA has determined that there will be 'no effect' to this species.

For all relevant projects, a verification letter under the January 5, 2016, Programmatic Biological Opinion (PBO) on Final 4(d) Rule for the Northern Long-eared Bat and Activities Excepted from Take Prohibitions was generated. For the Connecticut River Crossing and York Street Pump Station Project the shortnose sturgeon and the Atlantic sturgeon are federally listed species within the project site. These projects were evaluated as part of the U.S. Army Corps of Engineers (USACE) CWA 404 individual permit; USACE completed Section 7 consultation and conditions to ensure the safety and protection of endangered species are included in the executed permit.

The Connecticut River Crossing and York Street Pump Station Project requires work as well as the discharge of approximately 10.66 acres of dredged and fill material in the Connecticut River, a navigable water of the United States. On December 18, 2020, SWSC received a USACE individual permit pursuant to Section 404 of the Clean Water Act and Section 10 and 14 of the River and Harbors Act for their work in the Connecticut River. Minor impacts to wetlands may occur in the vicinity of the West Parish Filters and Cobble Mountain Hydroelectric Station but will not significantly affect wetlands.

A few census geographic units have people of color and low-income populations that are greater than 50 percent or have a higher percentage than the comparative state and county levels. Therefore, EPA has determined that environmental justice communities are present within the Project. No tribal areas were identified at the Project locations. Temporary impacts associated with project activities, such as construction noise, vehicle emissions, construction-related erosion, or traffic impacts, are not anticipated to disproportionately affect environmental justice communities with the implementation of standard construction mitigation and best management practices, such as dust and traffic control and the use of noise reduction measures on equipment when available. The Project would not result in any identifiable adverse human health effects and is expected to result in an overall benefit to the community.

Project Notification Form was submitted to Massachusetts Historical Commission (MHC) for all projects. MHC responded for each project that the projects are unlikely to affect historic or archaeological resources.

## Attachment 2: Project Description and Location

#	Project Name	Location	Description		
	Springfield Regional Wastewater Treatment Facility (SRWTF) Projects				
1	Aeration System	Springfield Regional	This project includes the design and		
	Upgrades	Wastewater Treatment	construction of upgrades to the aeration		
		Facility	system including replacement of the		
			distribution piping and diffuser heads.		
		250 M St			
		Agawam, MA 01001			
4	Biological Nutrient	Springfield Regional	This project involves the design and		
	Removal Process	Wastewater Treatment	construction to convert the existing		
	Upgrades	Facility	aeration basins to a hybrid MLE process.		
			The work involves the creation of		
			additional anoxic treatment volume, new		
			anoxic mixers, slide gates and actuators,		
			mixed liquor recycle pumping		
			improvements, and electrical		
			modifications.		
5	Electrical System	Springfield Regional	Phase 1 involves the design and		
	Improvement	Wastewater Treatment	replacement of the original, 40-year-old		
		Facility	primary electrical feeds, switchgear,		
			motor control panels, a 250-kW		
			emergency generator, and feeds		
			to the power centers. Phase 2 will		
			involve replacing primary and secondary		
			power distribution cables between		
			power centers throughout the plant.		
6	Grit Removal System	Springfield Regional	Involves converting two gravity		
	and Primary Calrifier	Wastewater Treatment	thickeners to grit removal tanks and		
	Upgrades	Facility	upgrading unused grit cyclones and		
			classifiers. The project consists of		
			improvements to the four primary		
			clarifiers, including replacement of the		
			traveling bridges with chain and flight		
			collector mechanisms, replacing sludge		
			trough liners, concrete restoration and		
			epoxy coating the concrete tanks.		
7	Rehabilitation of the	Springfield Regional	This project involves the design and		
	grit and screenings	Wastewater Treatment	construction of a new ventilation system		
	building ventilation	Facility	for the Grit and Screening Building and		
	system		connection to an existing odor control		
			system. The improvements will include a		
			new supply air duct located on each side		
			of the Rack Room, exhaust ducts, a new		
			hot water circulator pump installed at		

			the heat exchanger to handle the new
			Rack Room Heating Zone, and integral
			gas monitoring safety instrumentation.
			Ventilation exhaust air will be treated
			through the on-site odor control system.
	Cobbl	e Mountain Hydroelectric Stat	ion (CMHS) Projects
11	Cobble Mountain	Cobble Mountain	The penstocks consist of two 93-inch
	Hydroelectric Station	Hydroelectric Station	diameter pipes and one 66-inch
	Penstock Repairs		diameter pipe, each approximately 585
		Closest cross-street is	feet in length. Repairs may include
		Wildcat Road	grinding and welding; slip-lining or
		Granville, MA 01034	partial replacements will also be
			considered.
		"42.11705876359751, -	
		72.86439735727892"	
12	Cobble Mountain	Cobble Mountain Reservoir	Diversion Gate House - Modifying the
	Reservoir Outlet	Granville, MA 01034	Diversion Gate House to allow year-
	Improvments		round use. Located at the base of the
			Cobble Mountain Reservoir Dam,
			freezing hazards prevent the use of the
			Jet Flow gates in cold weather months,
			leaving only one conveyance route for
			withdrawing water from the Reservoir
			for six months per year. Air flow and
			supply modifications will reduce icing
			and allow year-round emergency
			operation.
			<b>CMHS</b> - Replacing an out-of-service
			turbine (unit 2) at CMHS with a pressure
			relief valve or an orifice plate to allow
			water to pass through the power plant to
			the treatment plant without generating
			power. Currently, the two operational
			turbines at the CMHS require discharge
			of generated power to the electrical grid.
			The ability to move water through the
			CMHS without the production of
			electricity will allow SWSC to convey
			source water through the facility when
			the grid is down due to damage or
			maintenance.
26	Rehabilitation of Inlet	Cobble Mountain	This project includes design and
	Control Valves on Unit	Hydroelectric Station	construction services for removing the
	Nos. 1 & 3 and		affected valves for repairs.
	inspection of the		

	penstock at CMHS		The penstock inspection will also aid in
			making any necessary repairs done in an
			adjacent project (Project 11)
27	Drain Line	From Cobble Mountain	This project includes evaluation of the 6-
	Replacement at CMHS	Hydroelectric Station along	inch diameter CMHS Drain Line,
		the Little River past the	approximately 150 feet, and if necessary,
		Springfield Water Works	design and construction for the
		Intake Reservoir	replacement main.
32	Transmission Line 637	In area of Cobble Mountain	It includes an additional three years to
	Poles Replacement	Hydroelectric Station	replace 637-line poles. Poles to be
			replaced in FY2021 and FY2022 serve as
			power supply poles for WPF as well.
	West F	Parish Filters (WPF) Water Trea	atment Plant Project
13	WPF Facility	West Parish Filters Water	New DAF Process and Treatment Plant -
/	Improvements Design	Treatment Plant is located	This project includes the installation of a
15	& Construction	in Westfield, MA, with the	new 80 million gallon per day (MGD)
		nearest address of 1599	Dissolved Air Flotation (DAF) clarification
		Granville Road.	process designed to reduce total organic
			carbon in the treated water. The DAF
			process was evaluated and selected
			through a multi-season piloting study.
			A new facility is proposed to house the
			DAF process, filters, and new chemical
			feed systems for coagulation, corrosion
			control, and disinfection. The new
			processes would replace the existing
			bulk chemical storage facility and allow
			SWSC to replace the existing chlorine gas
			system with a sodium hypochlorite
			system, eliminating the risk associated
			with the use of chlorine gas.
			Sizing the new water treatment plant at
			80 MGD will allow for the elimination of
			the existing Slow Sand Filters.
			The project also includes on-site
			electrical distribution system
			improvements required to support the
			upgrades.
			Raw Water Feed Pipelines Upgrade – A
			60-inch bypass around the existing
			Control House is proposed to provide a
			secondary route of source water
			conveyance to the new water treatment
			facility. The existing Control House is
			corroded, aging, space limited, and

			presents code considerations for any
			new work within this building.
			Replacement of the existing twin 42-inch
			raw water pipelines from the
			Sedimentation basin to WPF with 60-inch
			diameter pipes is proposed. The larger
			diameter mains can be expected to
			reduce the head loss to help improve the
			plant hydraulic capacity.
16	Replacement	West Parish Filters Water	The proposed Clearwell is a below grade
	Clearwell and	Treatment Plant	filtered water storage tank, with
	Backwash Pumps at		backwash pumps and associated
	West Parish Filters		pumping systems for on-site water
			usage.
17	Return to Service of	From Cobble Mountain	This project includes the repair or
	42-inch Raw Water	Reservoir via the Power	replacement of portions of the existing
	Conveyance (RWC)	Tunnel directly to the	precast concrete cylinder pipe and other
	Pipeline	Sedimentation Basin at	pipeline appurtenances which were
		West Parish Filters Water	damaged.
		Treatment Plant	
18	Lagoon Cleaning at	Upper and Lower Lagoons	This project includes a bathymetric
	West Parish Filters	at the West Parish Filters	survey, sediment sampling and analysis,
		Water Treatment Plant	engineering planning, permitting, design,
			and construction associated with the
			dewatering and disposal of the
			accumulated solids.
19	Combined Conduit	West Parish Filters Water	This project includes the design and
	Hydropower Turbine /	Treatment Plant	construction of a 2.0 MW hydroelectric
	Energy Dissipation		turbine at WPF to generate onsite
	Valve Facility,		power. The facility will be designed to
	Equalization Tank, and		include new energy dissipation valves
	Electrical Upgrade		and will be located at the Outlet Works
			of the 42-inch RWC Pipeline (Project 17).
			The facility will also include an
			equalization tank to neutralize flows
			prior to conveyance by a new 60-inch
			water main to the new treatment works
			(Project 13/15). To accommodate the
			hydro facility, upgrades to the electrical
			system will include several new
			transformers, a new main medium
			voltage switchgear, and a new medium
			voltage duct bank which will allow
			integration of the hydro facility into WPF

			electrical infrastructure and allow for
			anticipated future process upgrades.
			The existing aging CMHS will likely be
			decommissioned at the completion of
			this project.
34	WPF Bulk Chemical	West Parish Filters Water	This project involves upgrades to the
	Storage	Treatment Plant	chlorine storage and feed system and
			improved primary coagulant storage in
			the chemical building at WPF.
			New sprinkler and fire protection
			systems will also be installed to improve
			plant staff safety in the chemical
			building.
	-	Provin Mountain Rese	ervoir
21	Provin Mountain	Tank Nos 2, 3, and 4	This project at the Provin Mountain
	Finished Water	Provin Mountain Reservoir	Storage Tanks includes cleaning and
	Storgae Tank	Agawam, MA	inspection, as well as maintenance of the
	Condition Assessment	"42.09660039827696, -	valves and sluice gates to allow for
		72.697698177474"	reliable isolation of the tanks.
35	Provin Mountain	Provin Mountain Reservoir	This project involves a tank condition
	Reservoir Tank –		assessment, and the installation of
	Structural Monitoring		internal and external monitoring points
			to be used for surveys to establish
			baseline conditions and to monitor for
			future movement.
	Wastewater Collection	and Water Distribution Pipe In	nspection and Rehabilitation Projects
22	Planning and Design	SWSC Service Area within	This project involves the planning,
	of Collection System	Springfield	preliminary, and final design for the
	Improvements		construction of sewer infrastructure
			improvements, including pipe and
			mannole repairs, renabilitation, and
			replacement, for a ten-year period from
			2021 to 2033. Construction of these
22	Cower Debabilitation	SW/SC Somilas Area within	This projects is for source republication
23		Swsc Service Area within	project is for sever renabilitation
	$\frac{1}{10000000000000000000000000000000000$	Springheid	future construction consons from EV
	FY 2020		2024 through EV 2026, as designed
			2024 through Fr 2020, as designed
			allocation will allow for the replacement
			anocation will allow for the replacement
			miles of sewer main pervear
25	Water Distribution	SW/SC Service Area within	Approximately 4 to 5 miles of water
25	System Main	Springfield and Ludlow	main replacement per year are planned
	System Main	Springheid and Eddlow	manifepiacement per year are planned

	Replacement Program		as part of this program, which is
			scheduled to occur over consecutive
			construction seasons, from 2022 through
			2026.
29	Cleaning and	SWSC Service Area within	This project involves the cleaning and
	Assessment of	Springfield	assessment of sewer infrastructure
	Collection System		improvements, including pipe and
	Improvements		manhole repairs, rehabilitation, and
			replacement. These projects will be
			designed under Project 22.
		Other Projects	
24	Mill Locust Transfer	Project area bounded by	The project is comprised of multiple
	Project	York Street, Locust Street,	proposed system improvements and
		Mill Street, and the	optimizations. The main goal of the
		Connecticut River	project is to construct the MIS Diversion
			and Transfer Pipeline to bypass the flows
		Springfield, MA	of the MIS to the new 72-inch
			Connecticut River Crossing pipe to
			facilitate the future inspection and
			rehabilitation of the 66-inch MIS River
			Crossing. However, due to the required
			bypass conditions during construction,
			there are several accompanying
			improvements to existing infrastructure
			that need to take place. In addition,
			there are several proposed
			improvements within the catchment
			upstream of the Main Intercepting Sewer
			(MIS) to reduce CSOs.
30	Connecticut River	Pump station at W York St	This project involves the design and
	Crossing and York	Springfield, MA	construction of a new pumping station at
	Street Pump Station		York Street with increased capacity from
		Mains crossing under the	34 MGD to 64 MGD. This capacity
		Connecticut River to the	increase will be served by two new 42-
		Springfield Regional Water	inch diameter force mains and a 72-inch
		Treatment Facility	diameter siphon pipeline crossing under
			the Connecticut River for approximately
			1,100 LF to a new influent structure to
			receive these lines at the SRWTF.
33	Water Conservation &	SWSC Service Area	This project involves a comprehensive
	Utilization Program		program to utilize smart water meter
			technology to provide real time system
			information. Only price for the device
			itself. Residential – does not include
			larger more industrial installations