



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Robert R. Scott, Commissioner

June 24, 2020

Sarah L. Stewart
Commissioner
NH Department of Natural & Cultural Resources
172 Pembroke Road
Concord, NH 03301

RE: NHDES COMMENTS – MT. SUNAPEE RESORT'S ANNUAL OPERATING PLAN (2020-2021)

Dear Commissioner Stewart:

The New Hampshire Department of Environmental Services (NHDES) is pleased to provide its comments relative to Mt. Sunapee Resort's Annual Operating Plan (AOP) for 2020-2021. Comments offered by NHDES through this letter are submitted in accordance with its role as a member of the Mt. Sunapee Resort Advisory Commission, established pursuant to RSA 12-A:29-a, and in compliance with the *Public Involvement and Oversight Policy for Mt. Sunapee Ski Area*.

This letter includes the findings provided by NHDES program staff in response to the annual review of the Mt. Sunapee AOP. Topics covered included climate change, air quality, wetlands, erosion control, storm water management, drinking water services, surface water and groundwater protection, water use reporting, wastewater collection, treatment and disposal, wastewater residuals management (*i.e.*, septage and sludge), dam safety, petroleum fuel storage, recycling/resource recovery, and solid and hazardous waste management. Program staff reported that the above programs and permits are currently in compliance as conditions exist on the date of this review.

NHDES supports the 2020-2021 AOP and its implementation over the coming year, since virtually all of the work proposed will be restricted normal maintenance activities at the resort, including those projects already reviewed by NHDES for the current Five-Year Master Development Plan (2016-2020). If there are questions regarding the attached review, please feel free to contact me by telephone at (603) 271-3306 or by email at Timothy.Drew@des.nh.gov.

Sincerely

Timothy W. Drew
Administrator
Office of the Commissioner

Cc: Robert R. Scott, Commissioner, NHDES
John Duclos, Interim Assistant Commissioner, NHDES
Members, NHDES Review Team



Mount Sunapee Resort's Annual Operating Plan (2020-2021)

NHDES COMMENTS

June 24, 2020

INTRODUCTION (General Comment)

It might be a prudent step in the Introduction section of the Mt. Sunapee Annual Operating Plan (AOP) to describe (at least in general terms) how the overall effects of the COVID-19 pandemic will influence the yearly operations set forth in this AOP.

SECTION A: RECREATIONAL ACTIVITIES AVAILABLE TO THE PUBLIC

Non-Skiing Activities

No comments

Dog Policy – NHDES Fact Sheet:

https://www.des.nh.gov/organization/divisions/water/wmb/coastal/scoop_the_poop.htm

Summer/Fall Activities

No comments

Winter Activities

No comments.

SECTION B: SKI LIFT OPERATIONS

No comments.

SECTION C: SNOWMAKING AND GROOMING OPERATIONS

No comments.

SECTION D: SKI SUPPORT SERVICES

No comments.

SECTION E: MAINTENANCE PROCEDURES

Groundwater Discharge Permit (GWP-198704058-N-004):

No changes or additions to the permit activities in this AOP, compared with the 2019-2020 AOP (see below).

The facility wastewater collection, treatment, storage, and disposal systems are in compliance with NH CODE OF ADMINISTRATIVE RULES PART Env-Wq 402 and the existing permit:

<https://www.des.nh.gov/organization/commissioner/legal/rules/documents/env-wq402.pdf>

The Mt. Sunapee Resort has a Groundwater Discharge Permit (GWP-198704058-N-006) for the unlined lagoons and spray irrigation site. Disposal of the treated wastewater on site is via infiltration from unlined lagoons and spray irrigation.

The most recent permit was issued June 13, 2018 and is valid until June 12, 2023.

The facility operators are keeping up with monthly operating reports and groundwater sampling as required by the permit. There are no known compliance issues.

Regarding the settled solids in the wastewater lagoons, as long as Mt. Sunapee maintains its Groundwater Discharge Permit, there is nothing in the NHDES Sludge Management NH CODE OF ADMINISTRATIVE RULES PART (Env-Wq 800,

<https://www.des.nh.gov/organization/commissioner/legal/rules/documents/env-wq800.pdf>)

that requires Mt. Sunapee to remove sludge from its lagoons. However, if this residual material is to be removed in the future, then that process will be subject to the Sludge Management rules.

Wastewater Lagoon/Sprayfield System Status:

The system is currently being operated in compliance with NHDES wastewater treatment and disposal requirements and standards.

Drinking Water and Groundwater:

The NHDES Drinking Water and Groundwater Bureau reviewed its database for the public water systems that service Mount Sunapee Ski Resort (PWS 2277030 and PWS 2237040) in response to the review of this 2020-2021 AOP. Currently, both systems appear to be in compliance with current monitoring and operational requirements. While “no major capital improvements projects are planned” for the summer of 2020 (Page 33), any improvement geared toward

increasing the capacity of the mountain could have an impact on the source capacity of both water systems. The installation of new ski trails, chair lifts, and parking spaces are all improvements that can incrementally increase the daily capacity and utilization by the resort.

According to the NHDES database, the principal water system (PWS 2277030); the one that serves the main lodge, is served by a single well that has a yield of 70 gallons per minute, and a pressurized storage tank having a capacity of 1,500 gallons. This yield can support between 3,500 and 4,000 persons-per-day using the “NHDES book value” water consumption NH CODE OF ADMINISTRATIVE RULES (Env-Wq 1008.03, <https://www.des.nh.gov/organization/commissioner/legal/rules/documents/env-wq1000.pdf>).

The resort already directs the water system operator to obtain and record regular water meter readings to gauge actual water consumption from both systems through the *Water Use and Registration and Reporting Program* (<https://www.des.nh.gov/organization/divisions/water/dwgb/dwspp/wurrrp/index.htm>). This will determine whether or when the Resort’s incremental expansions will eventually require an additional source. For transient, non-community water systems, there is no predetermined interval for which pump testing of the well is required.

SECTION F: SECURITY PROCEDURES

No comments.

SECTION G: EMERGENCY OPERATING PLAN

(See Fuel Storage, Section J, below)

SECTION H: STATUS OF SPECIAL USE PERMITS AND LEASES

No comments.

SECTION I: MARKETING AND ADVERTISING

No comments.

SECTION J: ENVIRONMENTAL MANAGEMENT PROGRAM

Climate Change/Energy Efficiency:

Mt. Sunapee has implemented many changes at the facility over the years that reduce the emissions from support engines, replacement of obsolete heating systems with new, more energy-efficient models, installing more energy-efficient snow guns, and the use of biodiesel fuels in its maintenance equipment, among other measures. NHDES supports Mt. Sunapee’s efforts to reduce energy use and mitigate its “carbon footprint” throughout its operations

<http://des.nh.gov/organization/commissioner/pip/factsheets/ard/documents/ard-24.pdf>.

Air Permitting:

Mt. Sunapee holds air permit #GSP-EG-0427. On page 25 of the 2020-2021 AOP, it should be noted that Mt. Sunapee requested a renewal of its *General State Permit for Source Category: Internal Combustion Engines – Emergency Generators or Fire Pump Engines*, which was renewed and reissued on June 25, 2015. It is stated in the 2019-2020 AOP that the GSP was due to expire on April 30, 2020. Due to the COVID-19 pandemic, NHDES extended the expiration date to July 31, 2020. Mt. Sunapee will be notified when the new GSP is issued and will be sent information on the registration process over the upcoming two weeks. Also, NHDES already completed the ownership transfer to Vail Resorts. In the future, the NHDES Public Information and Permitting Unit maintains the ability to coordinate all such permit transfers (<https://www.des.nh.gov/organization/commissioner/pip/index.htm>).

Dam Safety (regarding Best Management Practices/See also Section L):

The two dams onsite are inspected on a daily basis during the summer months by Mt. Sunapee Resort personnel and, at a minimum, weekly during the rest of the year. The dams are inspected for deficiencies that would need to be corrected immediately including sloughing of the slope, alignment of the embankment, settlement of the crest, sinkholes, animal burrows, seepage, tree and brush growth, and inadequate vegetative cover.

Wetland/Alteration of Terrain Impacts:

Since few ground altering projects are forecast between 2020 and 2021, no jurisdictional wetland impacts are expected.

The Alteration of Terrain Bureau offered no additional comments for this AOP.

Drainage, Erosion and Water Quality Issues:

See pp. 22-23 – Section J (C)

Even though Mt. Sunapee is not required by the USEPA to prepare and implement a Multi-Sector General Permit for storm water management for an industrial activity, as defined by the U.S. Code of Federal Regulations (40 CFR 122.26(b) xiv), the operators have nevertheless developed and are implementing a storm water pollution prevention plan for the facility (See page 25 of the 2020-2021 AOP).

Further, staff from the NHDES Watershed Assistance Section has been in contact with the Mt. Sunapee Resort team concerning the development of a sub-watershed management plan for Beck Brook in the Lake Sunapee watershed. Due to lack of funding and other factors, that planning process is on an ongoing status as of June 2020. However, a new development

involves the Lake Sunapee Protective Association (LSPA) and its recently-completed watershed management plan for the whole watershed: <http://www.lakesunapee.org/2020-wmp>. Included within the new Lake Sunapee Watershed Management Plan are some recommended actions that include the Mt. Sunapee Resort property, and LSPA and Mt. Sunapee Resort are working cooperatively on a proposed upcoming Watershed Assistance grant project that would implement some corrective actions at the Mt. Sunapee Resort Parking Lot #1.

Mt. Sunapee officials have also adopted numerous Best Management Practices (*e.g.*, annual sand/salt mixture cleanup, paints stored under cover, *etc.*) at the maintenance area to prevent inadvertent spillage of liquids and other contaminants from being released to Beck Brook and the surrounding environment (See the Environmental Management Plan Section J, pp. 25-28 of this AOP). NHDES fully supports these efforts to protect against contamination of surface water. As an added resource, NHDES suggests the Green SnowPro Program: <https://www.des.nh.gov/organization/divisions/water/wmb/was/salt-reduction-initiative/documents/green-snowpro-business-flyer.pdf>

One item that was not added to the 2020-2021 AOP from last year was to urge Mt. Sunapee to require that its winter maintenance crew be GreenSnow Pro certified. This should apply to both contractors and employees who spread salt and sand. The chlorides in Lake Sunapee have doubled in the last 20 years. This is a disturbing trend. Given the large winter parking lots, it is important that Mt. Sunapee Resort look carefully at its salt use.

NHDES is not sure that using a sand/salt mixture for sanding roads and parking lots in the winter qualifies as a BMP. Storing those materials in the building described certainly is, but a better BMP would be to designate low-salt use areas near surface waters or use brine instead of sand and salt, or make sure that all sand and salting equipment is calibrated annually or monthly, *etc.*

Another BMP for this site would be to enroll all snow and ice removal/management personnel in the New Hampshire Voluntary Certified Salt Applicator Program and have them take the full course, the exam, and be issued their annual certification by NHDES. This would be a robust BMP with measurable results and ensure that equipment gets calibrated, sand/salt is applied at the right amounts based upon the conditions of each storm, and this often results in cost savings for the applicators.

<https://www.des.nh.gov/organization/divisions/water/wmb/was/salt-reduction-initiative/index.htm>

It appears that there would be many opportunities on a property like this to expand storm water BMP installations on or adjacent to parking lots and other impervious surfaces. There may be opportunities to partner with the NHDES “Soak up the Rain Program” <https://www4.des.state.nh.us/SoakNH/> and design and install practices to manage and treat storm water originating from roofs and sidewalks, *etc.* Mt. Sunapee Resort could also consider

rain barrels, dripline trenches, and several other infiltration practices that would reduce the volume of storm water getting onto parking lots or other impervious pathways.

Water Usage and Conservation:

Mt. Sunapee Resort is required to report water use data, to the NHDES Water Use Registration and Reporting Program (WURR). Currently Mt. Sunapee Resort reports water use data for snowmaking (WUID #20411), as well as domestic usage and wastewater treatment (WUID #21008). The facility last submitted monthly water use data for the 2019/2020 snowmaking season, as well as Q1 2020 for the wastewater treatment. The facility is current with all water use reporting.

Septage/Sludge Management:

No comments.

Fuel Storage:

The Mt. Sunapee Resort currently has seven registered and active aboveground storage tanks (AST), AST facility ID #0000801. These ASTs include two, 275-gallon waste oil tanks, one, 275-gallon diesel tank, one, 500-gallon biodiesel tank, two-200-gallon lubrication oil tanks, and one, 330-gallon lubrication oil tank. The total storage currently at the facility is 2,055 gallons. The current Spill Prevention, Control and Countermeasures Plan (SPCC) Plan includes all of these tanks and was last reviewed on August 9, 2017. The next review would need to be conducted by August 9, 2022 or if other tanks were added to the facility. Per a review of NHDES files, as of June 9, 2020, the AST facility is currently in compliance.

The Mt. Sunapee Resort currently has three active underground storage tanks (USTs) and three USTs that are currently not in use and in temporary closure, UST facility ID #0111060. The three active tanks include one, 3,000-gallon #2 heating oil, one, 7,000-gallon diesel, and one, 5,000 -gallon gasoline tank. The three temporarily closed tanks include one, 10,000-gallon #2 heating oil, one, 5,000-gallon #2 heating oil, and one, 3,000-gallon #2 heating oil tank. The temporarily closed tanks have been in temporary closure since October 25, 2016, and were assessed on October 25, 2019 to be able to keep them in temporary closure for up to an additional three years. Per a review of NHDES files, as of June 9, 2020, the UST facility is currently in compliance.

Solid Waste Management:

Extensive recycling efforts at the facility, as described in the AOP, are noteworthy, and include waste oil, Styrofoam cups, and fluorescent lights, among several other components of the solid waste stream at the facility. NHDES supports and encourages the continued implementation of recycling/resource recovery efforts at the Mt. Sunapee Resort.

Hazardous Waste Management:

Hazardous Waste Generator Status: A check of the Mt. Sunapee records on file with NHDES revealed that all signed copies of manifests have been submitted and all fees have been paid for Mt. Sunapee's Quarterly Reports. Mt. Sunapee Resort is currently listed as an "inactive generator" and made this change to a non-hazardous parts washer on February 16, 2012. No additional manifests have been received by NHDES since June 1, 2010.

In October 2016, a temporary (30-day) active hazardous waste generator approval was issued to Mt. Sunapee Resort for the purpose of removing tank bottom sludge as a hazardous waste and completed arrangements for its removal to proper disposal. The Resort reinstated its inactive status in January 2017.

All other hazardous waste activities at Mt. Sunapee are compliant with NHDES laws, rules and standards.

SECTION K: SIGNAGE

No comments.

SECTION L: UTILITIES AND ROADS

Dam Safety:

NHDES Dam Bureau suggestions for the Mount Sunapee 2020-2021 Annual Operating Plan:

(Section L, Pg. 30)

Mount Sunapee Sewage Lagoon Dam, Newbury NH

NH Dam#: D168017

Latitude: 43.3361, Longitude: -72.0769, located adjacent to Mt Sunapee access road.

Annual Dam Registration fee: \$750, due by January 1 of each year, bill sent by October 31 each year.

Significant Hazard, NHDES inspects every four years

Last inspected 09/18/2017, next scheduled inspection by NHDES will occur in 2021

Inspection showed the dam to be well maintained and in good condition with the exception of some minor brush on the slopes that needed to be removed.

Mount Sunapee Parking Detention Pond Dam, Newbury NH

NH Dam#: D168020

Latitude: 43.3367, Longitude: -72.0730, located adjacent to Mt Sunapee ski area parking lot.

Annual Dam Registration fee: None for this dam.

Non-menace Hazard, inspected as necessary

Last inspected 11/6/2015

Typical dam safety maintenance items to check for that may require repair with these types of dams are:

- Sloughing of the slope
- Alignment of the embankment
- Settlement of the crest
- Sinkholes
- Animal burrows
- Seepage
- Tree and brush growth
- Vegetative cover

SECTION M: IMPLEMENTATION OF THE MASTER DEVELOPMENT PLAN (MDP)

No comments.