



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Robert R. Scott, Commissioner

June 12, 2019

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 (2019-2020)

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 2019-2020. Comments offered by NHDES through this letter are submitted in accordance with its role as a member of the Mt. Sunapee Ski Area Advisory Committee, established pursuant to RSA 21-G:11, 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 to the date of this review.

NHDES supports the 2019-2020 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
Clark B. Freise, Assistant Commissioner, NHDES
Members, NHDES Review Team



Mount Sunapee Resort's Annual Operating Plan (2019-2020)

NHDES COMMENTS

June 12, 2019

INTRODUCTION (General Comments)

- Throughout the body of the text for the draft 2019-2020 Mt. Sunapee Annual Operating Plan (AOP), the lead agency designation refers to the Mt. Sunapee Resort's owner as the "New Hampshire Department of Resources and Economic Development (NH DRED)." This needs to be corrected throughout to reference the new, "New Hampshire Department of Natural and Cultural Resources (NH DNCR)," as shown on the title page.
- There doesn't appear to be any direct reference in the draft AOP text to the new lease holder of Mt. Sunapee Resort, Vail Resorts, NE. Should this be stated?

SECTION A: RECREATIONAL ACTIVITIES AVAILABLE TO THE PUBLIC

Non-Skiing 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):

- 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 rules (Env-Wq 800, <http://des.nh.gov/organization/commissioner/legal/rulemaking/documents/env-wq800-adptpstd.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.

Dam Safety:

NHDES Dam Bureau suggestions for the Mount Sunapee 2019-2020 Annual Operating Plan

Please add on page 18 under “Building and Grounds”:

Maintenance of the dams is the responsibility of the Building and Grounds Supervisor.

Please add under Section J Best Management Practices:

The two dams on site 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.

Please add under Section L

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

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 2019-2020 Annual Operating Plan. 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 2019 (Page 35), 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 rules (Env-Wq 1008.03). 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. 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

No comments.

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 26 of the 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. The permit is due to expire on April 30, 2020. With the recent sale of Mt. Sunapee Resort to Vail Resorts, there will be a need to transfer ownership of this permit (and several other permits from NHDES) to the new owner. The

NHDES Public Information and Permitting Unit can assist in coordinating the process (<https://www.des.nh.gov/organization/commissioner/pip/index.htm>) for all permit transfers.

Wetland/Alteration of Terrain Impacts:

Since few ground altering projects are forecast between 2019 and 2020, no jurisdictional wetland impacts are expected.

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

Drainage, Erosion and Water Quality Issues:

- 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 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 29 of the 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 2019.

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, pp. 30-32 of the 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>

Stormwater Management

- **Page 29 – Section L**
 - a. Change “STORM WATER POLLUTION PREVENTION PLAN” to “STORMWATER POLLUTION PREVENTION PLAN” in the header.
 - b. 1st paragraph – change “Storm Water...” to “Stormwater...” in two locations
 - c. Change (BMP) to (BMPs)

- d. Change “Comprehensive List of Best Management Practices (BMP)” to “Comprehensive List of Best Management Practices (BMPs)” in this header and in the paragraph under it.
- e. Suggest changing the 1st paragraph under the header “Comprehensive List of Best Management Practices (BMPs)” to “Best Management Practices (BMPs) are generally considered to be specific practices that are used to minimize or prevent pollutants from having negative impacts upon groundwater and surface water resources such as ponds, lakes, rivers, streams, wetlands, and estuaries. Many structural and non-structural BMPs are associated with stormwater runoff abatement and treatment.
- f. 2nd paragraph under the header noted in “e” needs to have “BMP” changed to “BMPs” and suggest the entire paragraph be changed to: “BMPs are considered as either non-structural (procedures and policies that change behaviors and/or practices that eliminate or reduce the impacts from pollutants upon the environment) or structural (physical/constructed practices designed and installed to alleviate negative impacts of pollutants upon natural resources).”
- g. 3rd paragraph under same header above need to have “BMP” changed to “BMPs”

2. Page 30 –

- a. 1st bullet – Change opening text to “It is a Best Management Practice...” and insert “a” in front of “Best Management Practices” in second sentence. Also, the second sentence does not read right for some reason
- b. 1st bullet – 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>
- c. 2nd bullet – change “run-off” to “runoff.” Where are designated snow dump and melt areas located on the property? Is there sufficient buffer between them and

surface waters? Are they located on level ground with permeable soils? Are silt fences required to prevent trash and debris contained in snow piles from running off the snow dump areas into surface waters?

- d. 3rd bullet – Insert “a” after “It is” at beginning of text. After “...Maintenance Shop,” consider inserting “that” to flow into the statement better.
- e. Bullets 4 – 6: consider inserting “a” in front of “Best Management Practice” for consistency.

3. Page 31 –

- a. Consider inserting “a” in front of each occurrence of “Best Management Practice”
- b. Last bullet should reference the NH Stormwater Manual: Volume 3 Revision: 1.0 for Silt Fence and Hay Bale installations beginning on Page 90.

4. Page 32 –

- a. Consider inserting “a” in front of each occurrence of “Best Management Practice”
- b. 1st bullet – reference section of NH Stormwater Manual where these BMPs are found. The statement “It is Best Practices to have these check dams regularly cleaned and maintained.” does not say this happens at Sunapee. It just says that it is a good BMP but is Mt. Sunapee Resort actually doing this? Is it in an Operations and Maintenance Plan for all BMPs on the property? If so, say that here and reference the O&M document. If Mt. Sunapee is not doing it, this statement remains unclear.
- c. 2nd bullet – same comments as in “b” above relative to reference of the BMP and O&M.
- d. 4th bullet – A better BMP would be to allow more than just grass to grow along the edges of stream banks. Grass is quite ineffective as a healthy buffer BMP as it provides little to no shade of surface water and provides low to zero value habitat for wildlife. Promoting a wide enough, vegetated buffer that allows for saplings, bushes, and other understory species to mature and shade the stream is a far more effective buffer BMP for filtering pollutants and provided some degree of habitat along the margins of the developed landscape. Wider and more diverse buffers also attenuate flood flows far better than a mowed, monoculture of grass along the top of streambanks.

It appears that there would be many opportunities on a property like this to expand stormwater 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” and design and install practices to manage and treat stormwater 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 stormwater getting onto parking lots or other impervious pathways.

Water Usage and Conservation:

- Water conservation measures have been undertaken by Mt. Sunapee Resort over the years. Over the past two years, Mt. Sunapee Resort added auto-sensor faucets and toilets to conserve water.
- 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 for Q1 2019 and is up to date on all water use reporting. Questions about WURR should be directed to Stacey Herbold at (603) 271-6685 or at stacey.herbold@des.nh.gov.

Septage/Sludge Management:

No comments.

Fuel Storage:

Underground Petroleum Storage Tanks (UST)/Aboveground Petroleum Storage Tanks (AST):

The aboveground and underground storage tanks are registered and are believed to be in substantial compliance with the AST and UST rules. There is a current Spill Prevention, Control and Countermeasures (SPCC) Plan on file at NHDES.

Aboveground Storage Tank (AST) facility number = #0000801

- SPCC Plan: The current SPCC Plan is current. The next update is required in August 2022 unless changes/additions, *etc.* to the aboveground tank systems.
- Though a regulated AST site, all tanks are below 660-gallon volume lessens the requirements for those tanks.
All ASTs are believed to be compliant with NHDES laws, rules and standards.

Underground Storage Tank (UST) facility number = #0111060

- Class A & B operators have been certified and listed formally with NHDES.

- Current items overdue to meet NHDES rules for underground fuel storage tanks:

Tank #21

- Spill Bucket Tightness Test
- Last Tank/Piping Monitor Sensor Test: (ok now, but due 7-9-2019)

Tank #22A:

- Spill Bucket Tightness Test
- Last Tank/Piping Monitor Sensor Test: (ok now, but due 7-9-2019)
- Primary Containment System Test

Tank #22B:

- Spill Bucket Tightness Test
- Last Tank/Piping Monitor Sensor Test: (ok now, but due 7-9-2019)
- Primary Containment System Test:

Attached UST summary sheet, note tanks #16, 17 and 19 are in temporary closure.

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 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

No comments.

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

No comments.