

VERMONT ENVIRONMENTAL BOARD
10 V.S.A. Chapter 151

RE: Lula DuBois
RFD
Stony Brook Road
Northfield, VT 05663

Fay and George Coltey
Home Wilde Lane
Northfield, VT 05663

R. E. Tucker, Inc. by
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Findings of Fact and
Conclusions of Law
and Order
Land Use Permits
#5W0837, #5W0837 (Reconsideration), #5W0837-2
Petition for Revocation

On July 30, 1986, a Petition for Revocation was filed with the Environmental Board (Board) by William H. and Wanita L. Oren to revoke Land Use Permits #5W0837, #5W0837 (Reconsideration) and #5W0837-2 issued to the above Permittees on October 9, 1985, November 26, 1985, and June 23, 1986, respectively, by the District #5 Environmental Commission. These permits authorize the Permittees to operate a commercial gravel pit located off Stony Brook Road in Northfield, Vermont, and to construct an access road onto Vermont Route 12A and a bridge over the Dog River. The Petitioners allege that the Permittees are in violation of these permits because the limits of gravel extraction have been exceeded, erosion control conditions have been violated, proper dust control measures have not been implemented, calcium chloride was not used as required on project roads, vehicles have been serviced in the gravel pit in violation of such a prohibition, restrictions regarding the hours and days of operations have been violated, a circular truck traffic plan as required was not properly implemented, open burning has occurred at the pit in violation of permit restrictions, a larger area of the pit was exposed at one time than was permitted, an undisturbed 50 foot buffer strip was not maintained between the pit and the Dog River, the pit was operated prior to the completion of the access road and bridge as required in the permit, and access to the pit was not limited to Route 12A as required.

A prehearing conference on the petition was conducted by then Board Chairman Darby Bradley on August 22, 1986, in Montpelier with the following parties present:

Lula DuBois and Fay and George Coltey by Russell Niquette,
Esq.
R. E. Tucker, Inc. by Ronald Tucker and Peter J. Monte,
Esq.
William H. and Wanita Oren by Gary McQuesten, Esq.
Joe Ann Smith
Rick Smith

After hearing the alleged violations of the permit at the prehearing conference, Chairman Bradley visited the site to view the gravel pit operation. After a preliminary attempt by the Chairman to resolve this revocation proceeding by means of an assurance of discontinuance, the Board decided to proceed with permit revocation.

On February 20, 1987, Chairman Bradley convened a second prehearing conference in Montpelier, Vermont. At the prehearing conference the specific issues in the proceeding were identified, witnesses and exhibits were identified, and a schedule for submission of various documents was established.

The Board convened a public hearing on the Petition for Revocation on May 6, 1987, with additional hearing days on May 27 and September 9, 1987. The Board deliberated on this matter on November 8, 1987 and January 12, 1988. The Board deemed the record complete and adjourned the hearing on January 12, 1988. This matter is now ready for decision. The following findings of fact and conclusions of law are based upon the record developed at the hearing. To the extent that the Board agreed with and found necessary any findings proposed by the parties, those findings have been incorporated herein; otherwise, said requests to find are hereby denied.

I. ISSUES PRESENTED

The Board was presented with the following twelve specific allegations in this proceedings:

1. The extraction limits for 1986 as allowed in Land Use Permit #5W0837 were exceeded.
2. Erosion control has not been maintained as required in Condition #4 of the original permit.
3. Dust control has not been adequate as required by Condition #7 of the original permit.
4. The trucks from the pit create muddy conditions on Route 12A due to the Permittees' failure to use calcium chloride as required by Condition #6 of the original permit.
5. Vehicles have been serviced at the pit in violation of Condition #7 of the original permit.
6. The hours of operation of the pit as permitted in Condition #14 of the original permit have been exceeded.
7. The circular traffic plan has not been implemented as required by Condition #15 of the original permit.

8. There has been open burning of stumps and brush at the pit in violation of Finding of Fact #1 of the original permit.

9. More area of the pit has been opened up than the Permittees represented to the Commission during the hearings on the original permit.

10. An undisturbed 50 foot buffer zone between the pit area and the Dog River has not been maintained, as required by Condition #4 of Land Use Permit #5W0837 (Reconsideration).

11. The pit was operated before the road and the bridge were completed in accordance with the terms of the permit, in violation of Condition #5 of Land Use Permit #5W0837 (Reconsideration).

12. Access to the pit has not been limited to the redesigned Route 12A access, as required by Finding of Fact #5 of Land Use Permit #5W0837 (Reconsideration).

II. FINDINGS OF FACT

The following Findings of Fact correspond to each of the twelve allegations of violations presented by the Petitioners.

1. Extraction limits

- a. Land Use Permit #5W0837 authorized the operation of this gravel pit with specific limits on the amount of gravel that could be extracted. Average annual extraction rates of 25,000 cubic yards were authorized, except that during 1986 the extraction of up to 128,000 cubic yards was specifically approved. This one-time approval of 128,000 cubic yards for one year was granted to supply the so-called "Mill Hill" Agency of Transportation highway construction project.
- b. The records of gravel extracted from this pit during 1986 are not precise. Based on the records maintained by R. E. Tucker, Inc. (Exhibits #45 and #46) at least 126,921 cubic yards of material were extracted. However, using an alternative calculation method, up to 136,128 cubic yards of material may have been extracted.

2. Erosion control

- a. According to the original plans approved by Land Use Permit #5W0837, every effort was to be taken to prevent any silt or sediment from entering Stony Brook and the Dog River. To this end, any development on

the site is required to be performed in accordance with the strict erosion control measures outlined in Board Exhibits #19 and 20. Specifically, all runoff should be allowed to disperse and flow over existing grassy areas to Stony Brook and the Dog River. If any sediment is carried to water courses which lead to either Stony Brook or the Dog River, hay bale dams are to be placed so that all runoff from the active portion of the pit is filtered by the hay bales. Also, all runoff within the pit is to be directed towards the sedimentation basin area which is to be constructed in the lower portions of the pit as shown in the site plans. After construction the lawn must be seeded and mulched in accordance with the landscaping specifications. In any event, Stony Brook and the Dog River are to be protected at all cost.

- b. Land Use Permit #5W0837 (Reconsideration) contained additional erosion control specifications for the installation of the revised access road and bridge over the Dog River. Specifically, the bridge contractor was prohibited from entering the stream bed for excavation other than to place stone fill or **riprap** to protect the abutment. A silt fence was to be placed on the north side along the edge of the existing stream bank to prevent sediment from entering the Dog River during the excavation for the abutment. Temporary access for construction of the Dog River bridge was to be by fording Stony Brook near the existing entrance driveway.
- c. The project's reclamation plan as outlined in Exhibit #20 contains many additional provisions to minimize erosion on the gravel pit banks by limiting the amount of exposed area, reclaiming the pit as it is excavated in an east to west direction, limiting the slopes of the pit faces, and immediately implementing the final seeding and mulching provisions as soon as final grades are developed. It was anticipated that it would take a 15 year period to complete the excavation of the ten-acre area of the pit.
- d. With one exception, the Permittees' erosion control procedures and practices did prevent unreasonable waterborne soil erosion. The exception is that on a few occasions large pieces of construction equipment have been driven across the Dog River near the site of the bridge. Until completion of the bridge, all construction equipment was to be brought onto the site via the Stony Brook crossing. Crossing the Dog River with construction equipment caused temporary sedimentation in the Dog River.

- e. The Permittees have not complied with the reclamation plan in terms of minimizing the amount of exposed area of the pit, limiting the slope of exposed pit faces, and immediately seeding and mulching the areas to be reclaimed. During the summer of 1986, a much larger area of the pit was opened than originally anticipated. No more than ten acres was to be opened in the pit over the full life of the permit. The Permittees opened and exposed a total area of ten to twelve acres during the summer of 1986. Little if any reclamation was accomplished during 1987. Because so large an area of steep slopes was left exposed, the pit has been subject to significant soil erosion on windy days resulting in very dusty conditions in the surrounding area. See Exhibit #34.

3. Dust Control Pursuant to Condition #6

- a. Condition #6 of Land Use Permit #5W0831 specified that the pit operator was responsible for adequate and timely application of calcium chloride for dust control as set out in Commission Exhibit #18 (Board Exhibit #22). This document, prepared by the Permittees' engineer, indicates that calcium chloride will be applied to the haul road at a rate of five tons per mile or a total of 1500 pounds for an 800 foot section of road. Calcium chloride is the preferred method for dust control on roadways because it retains moisture in the road surface for a much longer period of time than water.
- b. During a portion of 1986, the Permittees did not apply calcium chloride to the haul road as required. Instead, water was applied by a watering truck purchased by the Permittees for this purpose. Although the application of water was effective for a short period of time after application, it soon dried out. If water was not immediately reapplied, dusty conditions were created by the heavy truck traffic on the haul road. The dusty conditions were witnessed by area residents on numerous occasions during 1986.
- c. By July of 1986, the Permittees had applied some calcium chloride to the pit access road between Route 12A and the Dog River Bridge. The Permittees did not believe that they were required to apply calcium chloride to the remainder of the pit's access roads.

4. Muddy Conditions on Route 12A:

- a. The Petitioners maintain that the Permittees' failure to apply calcium chloride on the access road as required by Condition #6 resulted in a loose surface

on the haul road which, under wet rainy conditions, resulted in excessive mud being tracked onto Route 12A by the gravel trucks. The Petitioners contend that calcium chloride binds the surface fines together, thereby creating a harder surface that is less likely to be disturbed during wet conditions.

- b. During and after wet and rainy periods, large amounts of mud and dirt were tracked out of the pit area and deposited on Route 12A by the gravel trucks. The Permittees were observed by neighbors on more than one occasion sweeping dirt and mud off Route 12A after rainy periods.
- c. Large amounts of mud were also observed on rainy days where Lover's Lane intersects with Route 12A while heavy hauling operations were underway for the Mill Hill Project.
- d. No expert testimony was presented by any party which showed that the lack of calcium chloride on the haul road resulted in more mud being tracked onto Route 12A than if calcium chloride had been used.

5. Vehicle Servicing in Pit

- a. Condition #7 of the Land Use Permit prohibited the servicing of vehicles at this gravel pit without the Commission's review and approval of a suitable containment plan. No such plan has been submitted to the Commission to date.
- b. Although no servicing of gravel trucks has occurred in the pit, some of the equipment located in the pit, such as bulldozers and loaders, has been routinely maintained while still in the pit. Some machinery was fueled in the pit on a routine basis.
- c. On a few occasions, minor repairs were performed in the pit when it was impractical to remove the piece of equipment from the pit. Some oil changes were performed on the larger equipment that could not be easily removed from the pit.
- d. There was no evidence submitted to suggest that any of these activities resulted in any significant soil contamination or water pollution.

6. Hours of Operation as Specified in Condition #14

a. Condition #14 of the original land use permit imposed the following limitations on the operations of the pit:

1. Daily hours shall not exceed 7:00 a.m. to 5:00 p.m.; the pit shall not operate on Saturdays or Sundays; the pit shall not operate on state and federal holidays as recognized by legislative enactments.

2. Condition #14 was amended by the Environmental Board to allow limited operations on Saturdays as follows:

The gravel pit may be open a maximum of 19 Saturdays per year, from 9:00 a.m. to 12:00 noon, for the limited purpose of loading trucks with gravel and driving the trucks out of the pit. The use of any machinery other than what is needed to load trucks is prohibited at any time on Saturdays.

b. The gravel pit was operated on August 15, 1986 (Bennington Battle Day) and on March 3, 1987 (Town Meeting Day), both official state holidays.

c. Adjoining property owners have witnessed equipment being taken into and out of the pit before 7:00 a.m. and after 5:00 p.m.

7. Circular Traffic Plan - Condition #15

a. Condition #15 of the original permit required the Permittees to implement the circular pit traffic plan as specified in Exhibit #19. This exhibit outlined two traffic patterns to be used by the Permittees to eliminate the necessity of having gravel trucks back up in the pit to minimize beeper noise. Exhibit #19 included two illustrations which show intended circulation patterns within the pit.

b. During much of 1986, the Permittees did not use either of the approved circulation plans in the pit. As demonstrated by an aerial photograph taken in 1986, a circular traffic pattern was in place but it included a long spur road on which trucks were required to back up to get to the pit face for loading.

- c. The use of this spur road resulted in more noise from back-up beepers than there would have been if the Permittees had followed the approved plans.
- d. The Permittees argued that at times during the operation of the pit in 1986 it was not practical to exactly follow the approved plans because there was not sufficient room at the pit face to keep the access road pattern exactly as permitted. The Permittees estimated that they were able to use the circular pattern as approved about 50% of the time.

8. Open Burning - Finding of Fact #1

- a. The Applicants indicated at the District Commission hearing that all trees, brush, and stumps would be buried on the site. On at least two occasions, December 6, 1985, and July 24, 1986, the Permittees disposed of these materials by burning them on the property.
- b. Other than the general statement contained in Finding of Fact #1 that the project would not result in undue water or air pollution, there is no specific prohibition against open burning in the land use permit or findings of fact.
- c. Prior to the open burning on the site, the Permittees obtained a local burning permit from the town fire warden. Mr. Tucker was unaware that he also should have obtained a burning permit from the Air Quality Section of the Agency of Environmental Conservation prior to burning these materials on this site.
- d. Although Mr. Tucker was aware of the representations that he had made at the Commission hearing that debris would be buried on the site, he made the conscious business decision to burn these materials because of the cost savings that would result.
- e. The burning of trees, brush, and stumps resulted in some air pollution in the area on the two dates when burning occurred. Some smoke and ash were blown onto adjoining properties.

9. More Area of the Pit Opened than Permitted by the District Commission

- a. The extraction plan included in the application submitted to the District Commission specified that the pit would be excavated in an east to west

direction, that areas of exposed banks would be minimized by reclaiming exposed areas as the pit was excavated, and that the total area to be excavated would not exceed ten acres during the projected 15 year life of the pit.

- b. During the summer of 1986, the Permittees estimated that between 10 and 12 acres of the pit were opened and left exposed. No pit reclamation was undertaken during that year.
- c. Some limited reclamation was accomplished during the 1987 construction season. However, a large portion of the pit remains open and unreclaimed.
- d. The Permittees indicated that reclamation was not possible during the summer of 1986 because of the large volumes of material that were being removed from the pit for the Mill Hill Project and because of changing project specifications by the Agency of Transportation which required opening additional areas of the pit to obtain the necessary materials for this roadway. The Permittees claim that because of time limitations it was not possible to apply for an amendment to the permit to gain approval for the larger excavated area, and that reclamation efforts were not undertaken at the end of the Mill Hill project hauling because of the late time of year.

10. Undisturbed 50 Foot Buffer Strip

- a. Condition #4 of Land Use Permit #5W0837 (Reconsideration) required the Permittees to maintain a 50 foot undisturbed buffer strip from the Dog River to the nearest disturbed areas associated with pit excavations and stockpiles.
- b. The buffer area is shown on Exhibit #21, which is the project site plan approved in Land Use Permit #5W0837 (Reconsideration). Although this site plan shows this buffer area to have a significant amount of vegetation, in fact this buffer is sparsely vegetated in some areas or it is not as wide as represented on this plan.
- c. Except for the area disturbed by the construction of the bridge over the Dog River, the Permittees have maintained the buffer as it existed prior to operation of the pit by R. E. Tucker, Inc. The area in which the bridge was located was a portion of the buffer

that had little if any vegetation prior to disturbance by the Permittees. Stockpiles were not located within 50 feet of the river and no other excavation or disturbance occurred within this area.

11. Pit Operated in Violation of Condition #5 of Land Use Permit #5W0837

- a. Condition #5 of Land Use Permit #5W0837 (Reconsideration) specified that the pit could only be operated upon completion of the road and bridge as approved in the revised permit.
- b. As part of the District Commission's approval of the revised access road and bridge, the Commission relied on the approval issued by the Agency of Transportation for the access to Route 12. This access permit included a provision that the apron to the access road where it meets Route 12 had to be paved by July 1, 1986.
- c. The Permittees did not pave this access apron prior to operating the pit. When informed by a representative of the Agency of Transportation shortly after July 1, 1986 that they had violated the access permit, the Permittees agreed to pave the apron as required. The paving of the apron was completed on October 30, 1986. The pit remained in operation between July and October of 1986.

12. Access To The Pit Has Not Been Limited To Route 12A

- a. Finding of Fact #5 of Land Use Permit #5W0837 (Reconsideration) specified that the pit shall not be served by any entrance or exit onto Stony Brook Road, which is the eastern boundary of the tract of land. With the new bridge access approved in the revised permit, there was no need to gain access to the pit from Stony Brook Road or from Home Wilde Lane. Home Wilde Lane intersects with Stony Brook Road just to the north of the pit and can be used to gain access to the upper elevations of the pit.
- b. After completion of the bridge and access road, the Permittees discontinued the use of the direct pit access off Stony Brook Road. At times during the operation of the pit, however, Home Wilde Lane and Stony Brook Road were used to bring heavy equipment into the upper elevations of the pit area. Heavy equipment must be brought into the upper elevations of

the pit via this road because of the steepness of the terrain and the difficulty in getting equipment to these upper areas from the main pit floor. The Permittees estimate that they have used the access roads about five or six times during the operation of the pit.

- c. The Permittees have not hauled any gravel out of the pit via Home Wilde Lane or Stony Brook Road after the bridge and access road from Route 12A were operational.

III. CONCLUSIONS OF LAW

The issue before the Board is whether the activities described in the Findings of Fact constitute violations of the permits, and if so, whether the appropriate remedy is revocation of the permit. The authority for revocation of a permit is set forth in **10 V.S.A. § 6090(c)**:

(c) A permit may be revoked by the board in the event of violation of any conditions attached to any permit or the terms of any application, or violation of any rules of the board.

Board Rule 38(A) (2) further amplifies the grounds for permit revocation:

(2) Grounds for revocation. The board may after hearing revoke a permit if it finds that: (a) The applicant or his representative willfully or with gross negligence submitted inaccurate, erroneous, or materially incomplete information in connection with the permit application, and that accurate and complete information may have caused the district commission or board to deny the application or to require additional or different conditions on the permit; or (b) the applicant or his successor in interest has violated the terms of the permit or any permit condition, the approved terms of the application, or the Rules of the board; or (c) the applicant or his successor in interest has failed to file an affidavit of compliance with respect to specific conditions of a permit, contrary to a request by the board or district commission.

Based upon the above Findings of Fact, it is clear that the Permittees have violated a number of the conditions of the permit and the approved terms of the application. The severity

of the violations varies from minor violations such as the occasional failure of the Permittees to comply with a term of the application (e.g. that there would be no open burning) to severe violations such as the Permittees' almost complete disregard for the approved erosion control, mining and reclamation plans that resulted in a large percentage of the pit being left open and exposed.

With regard to each of the 12 allegations of violation presented by the Petitioners, the Board concludes the following:

1. Extraction limits - Because of the difficulty in interpreting the records regarding the total number of cubic yards extracted from the pit during 1986, it is not possible for the Board to rule definitively that there has been a violation of this condition of the permit. However, even if the highest estimate of 136,128 cubic yards proved to be accurate, the approval rate would have only been exceeded by 6%, an amount that would most likely not warrant permit revocation. In any event, it is more likely that actual extraction was close to the approved 128,000 cubic yard limit.

2. Erosion Control - The Permittees have violated the terms and conditions of the permit which were designed to minimize erosion from the site. In terms of waterborne erosions, the violations involved heavy equipment crossing the Dog River, resulting in some sedimentation in the river. A much more significant violation, however, was the Applicants' failure to follow the erosion control provisions of the approved erosion control and mining plans. By not limiting the amount of exposed pit area and progressively reclaiming the site as extraction occurred, large areas of pit surface have remained exposed, resulting in very significant windborne erosion from the site, among other significant impacts.

3. Dust Control Pursuant to Condition #6 - The Permittees failed to comply strictly with the dust control provisions of the permit by not applying calcium chloride on the haul road in a timely manner, thereby allowing dusty haul roads to result. Although the Applicants did eventually apply water on the haul road on a regular basis and by late in the year did apply some calcium chloride on the road, the project was operated in violation of this condition for some time.

4. Muddy Conditions of Route 12A - The Board is unable to conclude that the lack of calcium chloride on the pit haul road significantly contributed to the muddy conditions on Route 12 during rainy periods in 1986. The evidence suggests that it is most likely that the application of calcium chloride on this

road would not have made a difference in the amount of mud deposited on the road by the very heavy amount of truck traffic hauling to the Mill Hill project during 1986.

5. Vehicle Servicing in the Pit - The Permittees did not strictly comply with the vehicle servicing restrictions contained in the permit because some vehicle servicing was done in the pit. However, because the amount of servicing was limited and it apparently has not resulted in any significant environmental problems, this violation when considered alone is relatively minor.

6. Hours of Operation as Specified in Condition #14 - Because the pit was operated on two recognized State holidays, this provision of the permit was violated on these two occasions. Again, when considered alone, these violations were relatively minor.

7. Circular Traffic Plan - Condition #15 - It is clear from the above findings that the Permittees' failure to comply with this condition of the permit at all times caused the generation of additional noise from backing-up trucks. This violation is similar to others that, when considered alone, is relatively minor.

8. Open Burning - Finding of Fact #1 - Again, it is clear that the Permittees did not comply with representations they made at the hearing that all trees, stumps, and brush would be buried and not burned. However, because there were only two reported incidents when brush was burned, this deviation from approved disposal methods is also relatively minor when considered alone.

9. More Area of the Pit Opened than Permitted by the District Commission - As discussed above, the Permittees have not complied with the mining, erosion control, and reclamation plans approved by the District Commission by opening up much larger than approved areas at one time and by failing to reclaim open areas as extraction proceeded. These failures have resulted in significant adverse impacts under the following criteria of § 6086(a): 1 - air pollution, 4 - erosion control, 8 - aesthetics and scenic and natural beauty, and 9(E) - extraction of earth resources, and are of such significance that they warrant revocation of the permit.

10. Undisturbed 50 Foot Buffer Strip - based upon the evidence presented on this issue, the Board concludes that the Permittees have not significantly disturbed the 50 foot buffer strip along the Dog River. Therefore, this condition of the permit has not been violated.

11. Pit Operated in Violation of Condition #5 of Land Use Permit #5W0837 - It is clear that the Permittees violated this permit condition because the pit was operated before the pit access road was paved as required. As with many of the above violations, this deviation when considered alone is relatively minor.

12. Access to the Pit Has Not Been Limited to Route 12A - The Permittees have admitted that Home Wilde Lane was used at times to move heavy equipment into the upper areas of the pit, in possible violation of one of the findings of fact in the original permit. Because gravel was not hauled out of the pit via this road, this violation, if it even is considered to be one, is relatively minor.

As mentioned above, many of the violations of the permit terms or conditions are relatively minor when viewed in isolation. However, when the minor violations are added to the **Permittees'** failure to comply with the basic mining, erosion control, and reclamation plans approved by the District Commission, a pattern of serious permit noncompliance is revealed that clearly warrants permit revocation pursuant to 10 V.S.A. § 6090(c) and Board Rule 38(A) (2).

IV. REMEDY

Environmental Board Rule 38(A) (3) outlines the following procedures the Board may follow to correct violations prior to a permit revocation order becoming final:

(3) Opportunity to correct a violation. Unless there is a clear threat of irreparable harm to public health, safety, or general welfare or to the environment by reason of the violation, the board shall give the permit holder reasonable opportunity to correct any violation prior to any order of revocation becoming final. For this purpose, the board shall clearly state in writing the nature of the violation and the steps necessary for its correction or elimination. These terms may include conditions, including the posting of a bond or payments to an escrow account, to assure compliance with the board's order. In the case where a permit holder is responsible for repeated violations, the board may revoke a permit without offering an opportunity to correct a violation.

Because the Board has not found that any of the violations constitute a clear threat of irreparable harm to the public health, safety, or general welfare or to the environment, the

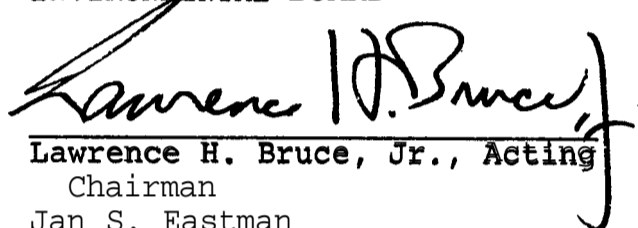
Board concludes that it is reasonable to give the Permittees the opportunity to correct the violations prior to the revocation order becoming final. The Board believes that the most expeditious method of correcting the violations would be through the signing of an assurance of discontinuance by the Permittees and the Board. This document would establish a strict schedule for reclamation of the pit and elimination of erosion problems, and would include a bond or other surety to assure compliance. Failure by the Permittees to sign or to comply with the assurance of discontinuance will result in final permit revocation.

V. ORDER

1. Land Use Permits #5W0837, #5W0837 (Reconsideration), and #5W0837-2 are hereby revoked. This order shall become final 30 days from the date the Permittees receive an Assurance of Discontinuance to correct the violations of the permits, unless the Permittees sign the assurance within that time period. If the Permittees sign the assurance, this order shall become final within 30 days from the date that the Permittees receive notice from the Board that they have failed to comply with all the terms and conditions of said Assurance.

Dated at Montpelier, Vermont this *19* day of January, 1988.

ENVIRONMENTAL BOARD



Lawrence H. Bruce, Jr., Acting
Chairman

Jan S. Eastman
Elizabeth Courtney
Samuel Lloyd
Arthur Gibb