

September 8, 2020

Vermont Department of Environmental Conservation
Drinking Water and Groundwater Protection Division
Attn: Rodney Pingree
One National Life Dr.
Davis Building – 4th Floor
Montpelier, VT 05620-1535

RE: Proposed Public Water Supply Sampling Plan For Contaminants with a Vermont Health Advisory – May 2020

Dear Mr. Pingree,

This letter is in response to the Proposed Public Water Supply Sampling Plan For Contaminants with a Vermont Health Advisory – May 2020 which is currently published for public review and comment.

The Richmond Water and Sewer Commission is dedicated to providing high quality water for our customers and supports sampling to ensure our water meets State standards. However, the proposed sampling plan includes the following statement in regards to VHA contaminant sampling:

These methods have a range of cost from \$50 to \$700 for each analysis. If all 43 chemicals are to be sampled, and the average cost is \$400 per sample, the total cost would be approximately \$17,200 per water system (or \$10.3 million if all subject water systems sampled), should public water systems bear the cost. This would be overwhelming for the majority of Vermont's public water systems. DEC therefore recommends a one-time funding mechanism to cover sampling costs.

The one time funding proposed in the plan simply does not go far enough. If this is to be an ongoing responsibility of water systems more State funding is necessary. Our water system struggles to keep costs down and provide reasonable rates to our customers. Adding a cost of \$17,200 per year for annual sampling is frankly too much of a burden on the budget. We are asking that the State ensure adequate funding for annual sampling and analysis

It appears to this Commission that the State is asking public water systems to fund sampling which will be capable of detecting evidence of groundwater contamination. Any source water

contamination that is detected by these tests will more than likely be from a source that is independent of the public water system. Therefore the cost of this testing should be borne by the State, and not public water systems which are the victims of groundwater contamination by a third party. Further, if source water is found to be contaminated, the burden to remediate that situation should be placed on the entity which caused the pollution, not the public water system.

Sincerely,

The Richmond Water and Sewer Commissioners,

Bard Hill

David Sander

Katie Mather

Fran Huntoon

Don Morin

CC: Liz Royer, Executive Director, Vermont Rural Water Association

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