

**Vermont Department of Environmental Conservation  
Drinking Water and Groundwater Protection Division**

One National Life Drive - Davis 4 [phone] 802-828-1535  
Montpelier, VT 05620-3521 [fax] 802-828-1541

<http://dec.vermont.gov/water>

*Agency of Natural Resources*

March 16, 2023

Town of Richmond  
Attn: Josh Arneson  
P.O. Box 285  
Richmond, VT 05477

Re: Sanitary Survey Letter, Richmond Water Department Water System, Public Community Water System, Richmond, VT, WSID #5084

Josh Arneson,

A sanitary survey of the Richmond Water Department Water System (Water System) was conducted on February 14, 2023. I represented the Vermont Department of Environmental Conservation, Drinking Water and Groundwater Protection Division (Division); Allen Carpenter, as the Designated Operator and Steve Cody, Operator in Training, represented the Water System. The Division issued the Water System a Permit to Operate (PTO) on July 29, 2013. Please note that the PTO does not have an expiration date, however the Division intends to issue a new PTO in the near future to update facilities.

During the sanitary survey and file review, the following **Permit Violation** was identified.

- 1. Inadequate Water Quality Monitoring and Reporting:** Per Section IV.B.1 of the Water System's PTO, the Water System is required to monitor daily finished water pH, disinfectant residual, and highest fluoride residual at the entry point to the distribution system and report these values on its Monthly Operating Reports (MORs). During the survey, it was reported that these data were being collected at the Wastewater Treatment Plant which is located near the end of the distribution system.

**The Water System shall immediately begin monitoring and reporting all water quality parameters as required by its PTO.**

***Please be aware that pursuant to 10 V.S.A, Section 8008, the Agency may issue an Administrative Order for the violation listed above. An Administrative Order would assess penalties, require correction, and/or remediation of the alleged deficiency and may require other measures as deemed appropriate.***

During the sanitary survey and file review, the following minor deficiency was identified and needs to be resolved.

- 2. Storage Tank Vent Not Properly Screened (ST003):** Per Chapter 21, Appendix A, Part 7.0.10(e) of the Vermont Water Supply Rule (Rule); All storage tank vents shall be protected with 24-mesh non-corrodible screen. All of the vents on the New Tank Storage Tank (ST003) are equipped with screening of larger than 24-mesh.

**On or before May 1, 2023, the Water System shall properly screen the vents and provide the Division with photographic documentation of the repairs.**

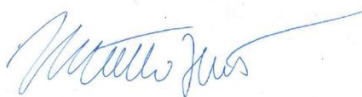
The following are submitted for the Water System's review and comment:

- 3. Updated Revised Total Coliform (RTCR) Sampling Plan Required:** Per Subchapter 21-6, Section 6.6.2 of the Rule, coliform sampling shall be conducted in accordance with 40 CFR, §141.21, which requires that Public Community Water Systems with a population of between 1,001 and 2,500 collect at least two (2) coliform samples per month. During the sanitary survey and follow-up correspondence, it was determined that since the last sanitary survey, the population of the Water System had exceeded the 1,001 threshold, and an updated RTCR Coliform Sampling Plan including two (2) routine monthly sampling sites is required. The plan and any related questions should be directed to David Love at [david.love@vermont.gov](mailto:david.love@vermont.gov). The Division requests that the updated RTCR Coliform Sampling Plan be submitted **on or before May 1, 2023.**
- 4. Chlorine Disinfection Residual:** During the file review and sanitary survey, it was observed and reported that the free chlorine residual samples collected in the distribution system are occasionally observed to be very low and barely detectable. Section III.C of the PTO requires continuous disinfection treatment. In order to ensure that a measurable free chlorine residual is maintained throughout and to the ends of the distribution system at all times, the Division requests that the Water System increase the disinfection level at entry point. Additionally, the Water System shall immediately begin reporting the daily low free chlorine residual as recorded at the Wastewater Treatment Plant on its MORs; and shall continue to do so until June 30, 2023.
- 5. Update System Contacts:** At the sanitary survey, it was reported that Steve Cody is an Operator in Training for the Water System. Steve is not currently listed as a system contact. Please update the system contacts electronically at the following link:  
<http://anonline.vermont.gov/?formtag=DWOfficialsContact>.

The Division requests that the Water System provide a written response to the above items **on or before April 16, 2023**. The written response should indicate that the compliance dates above are acceptable or provide alternative dates for review and approval. In the absence of a written response as requested, the Division may amend the Permit to Operate to include a compliance schedule to resolve these deficiencies.

I appreciate Allen and Steve taking the time to conduct the sanitary survey of the Richmond Water Department Water System. I look forward to working with you all in the future. If you have any questions or would like to discuss the survey, please feel free to contact me by email at [matthew.hunt@vermont.gov](mailto:matthew.hunt@vermont.gov), or by phone at 802-505-5490.

Sincerely,



Matthew Hunt  
Community System Operations Specialist

[Vermont Water Supply Rule](#)

cc: Dana Nagy, Community Operations Section Supervisor, DWGPD

Josh Arneson  
Richmond Water Department Water System WSID #5084  
March 16, 2023  
Page 3

David Love, Compliance Analyst, DWGPD  
Noelle Rizzardi, Environmental Technician, DWGPD  
Allen Carpenter, Designated Operator, WSID 5084  
WSID File 5084