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Source Water Protection Plan Submission

version 1.11

(Submission #: HQP-7VWZ-VPEZP, version 1)

Details

Submitted 6/11/2026 (4 days ago) by Ross Dunham

WSID VT0005125

Submission ID HQP-7VWZ-VPEZP

Status Submitted

Active Steps Administrative Review

Form Input

Water System Information

WSID
VT0005125

Name of Public Water System (PWS)
MONTGOMERY WATER SYSTEM

Water System Type (Please note the system type is presented based on what is currently listed in the Division database and is subject to change based on new information received.)
Public Community

Identified Water Sources

Source ID	Ground or Surface Water?	Active or Proposed
WL003	Ground	Active

Are these water sources correct?
Yes

Prepared by
Ross Dunham

Field Investigation Performed
06/05/2026

Is this the original, initial Source Protection Plan (SPP) of the water system ?
No

Is this a comprehensive rewrite of the existing Source Protection Plan?
Yes

Is this an update to the water system's Source Protection Plan?
Yes

Source Protection Plan Introduction (Basic)

The source protection plan being submitted includes all the above items.
Agree

Source Protection Plan (Update)

The source protection plan update being submitted includes all the above items.

Agree

Topographic Map (Basic)

Are the water system's water source locations (wells, springs, and intakes) accurately located and identified on the ANR Natural Resources Atlas?

Yes

[ANR Natural Resources Atlas](#)

The source protection plan being submitted includes all the above items.

Agree

Potential Sources of Contamination (Basic)

The source protection plan being submitted includes all the above items.

Agree

Management Plan of Risk (Basic)

Does the water system use Lake Champlain as a source?

No

The source protection plan being submitted includes all the above items.

Agree

Contingency Plan (Basic)

The source protection plan being submitted includes all the above items.

Agree

Appendices (Basic)

The source protection plan being submitted includes all the above items as appropriate.

Agree

Attachments

Source Protection Plan

[WSID 5125 Draft SPP Revision 2.26.2021-LRreview.pdf - 06/11/2026 01:34 PM](#)

Comment

NONE PROVIDED

Additional Documents

NONE PROVIDED

Comment

NONE PROVIDED

Certification

I certify that the water system has reviewed and agrees to the content of this Source Protection Plan and authorizes the submittal of this plan to the Drinking Water and Groundwater Protection Division.

Agree

I certify that the water system has reviewed and agrees to the content of this Source Protection Plan Update and authorizes the submittal of this plan to the Drinking Water and Groundwater Protection Division.

Agree

Attachments

Date	Attachment Name	Context	User
6/11/2026 1:34 PM	WSID 5125 Draft SPP Revision 2.26.2021-LRreview.pdf	Attachment	Ross Dunham

Internal Data

Label	Value
WSID	VT0005125

Status History

	User	Processing Status
6/11/2026 1:31:22 PM	Ross Dunham	Draft
6/11/2026 1:36:44 PM	Ross Dunham	Submitted

Audit

Event	Event Description	Event By	Event Date
Send Email	Source Protection Plan Submission email was sent to Laura.Ranker@vermont.gov.	Ross Dunham	6/11/2026 1:36 PM
Send Email	Source Protection Plan Submission Assigned to You email was sent to Laura.Ranker@vermont.gov.	Laura Ranker	6/15/2026 3:59 PM

Processing Steps

Step Name	Assigned To/Completed By	Date Completed
Form Submitted	Ross Dunham	6/11/2026 1:36:44 PM
Assign Reviewer	Laura Ranker	6/15/2026 3:59:08 PM
Administrative Review	Laura Ranker	6/15/26 & 6/22/26

Approved 6/22/2026
with edits by DWGPD

SOURCE PROTECTION PLAN

Montgomery Water System

WSID # 5125

Montgomery, Vermont



With assistance from:

June 1, 2017 SPPU



Updated on February 26, 2021 by Ross Dunham,
Operator (Draft provided to DWGPD for review).

**UPDATED June 2026 by Ross Dunham, Operator,
SOS.**

Approved 6/22/2026
with edits by DWGPD

Montgomery Water System
Source Protection Plan

Review Annually and Update Every 3 Years

Date Reviewed	Reviewer	Changes or Comments
June 2015		
May 2017	Simon Operation Services Montgomery Select board	Changes were made to the contingency section.
February 2021	Ross Dunham, Operator	Draft provided to DWGPD for review and comment
June 4, 2026	L. Ranker DWGPD	May 2, 2024 Sanitary Survey field gathered well geocoordinates gathered. April 22, 2026 correction to well location and SPA in the ANR NR Atlas mapping tool using 2024 Sanitary Survey gathered coordinates. June 4, 2026 – DWGPD recommended updates to the 2021 SPPU draft. Outlined in separate review summary provided to Ross Dunham. Copy is at back of this SPPU.
June 5, 2026	Ross Dunham, Operator SOS	Updates to 2021 draft, new SPA Maps, landowner listing, 2026 proposed Montgomery Floodplain Restoration Project located within SPA.
June 15, 2026 and 6/22/26	L. Ranker, DWGPD	DWGPD Removed watermark; removed outdated contact #s; corrected and updated website links for DWGPD and VGS found on Reference page, Preliminary Design Plans for the Montgomery Floodplain Restoration Project are available from Franklin County NRCD Program Manager, Mel Auffredou at email Mel@FranklinCountyNRCD.org or call 802-0503-7991, (the preliminary design plans triggered concern due to the proposed location of the access roadway and staging area proposed to be located within zone 1, protective isolation area of the SPA. Replaced PTO and Sanitary Survey Letter with most recent versions; Added Source Permit; removed outdated guidance; Added Updated SPA Maps Replaced 2011 approval letter with 2017 approval letter in Appendix I. Added Appendix J-2021 review summary and findings.

I. INTRODUCTION

A. Background and Purpose

The purpose of a Source Protection Plan is to identify water system vulnerabilities and to suggest techniques to manage land uses and activities that potentially may contaminate a public water source.

This Source Protection Plan covers one public well in Montgomery, Vermont – serving the Montgomery Water System (WSID 5125). This system is located in Franklin County and the Missisquoi River Drainage Basin.

A Public Water System is defined as “any system(s) or combination of systems owned or controlled by a person, that provides drinking water through pipes or other constructed conveyances to the public and that has at least fifteen (15) service connections or serves an average of at least twenty-five (25) individuals daily for at least sixty (60) days out of the year.” (Vermont Water Supply Rule, Chapter 21, Subchapter Section 2.2)

This Source Water Protection Plan was developed to protect the quality and quantity of this source and was prepared by the Montgomery Water System with assistance from the Vermont Rural Water Association. The objective of this plan is to identify potential contamination sources that occur within the Source Protection Area of this public water supply and to provide specific recommendations to manage these potential threats in order to maintain quality drinking water.

This document has been prepared in accordance with the Vermont Water Supply Rule, Chapter 21, last revised 1/1/2026. Under the Rule, a Source Protection Plan consists of the following basic elements:

- ❖ Source Protection Area Maps
- ❖ An inventory of potential sources of contamination (PSOCs);
- ❖ An assessment of risks posed by these PSOCs;
- ❖ A management plan to minimize risks to the water source(s); and
- ❖ A contingency plan for responding to emergency loss of the water supply.

This plan is a working document that will be reviewed at least annually and updated every three years to remain current, active, and viable. A carefully researched and thoughtfully drafted Source Protection Plan is an important first step in source water protection because it sets priorities for actions to take in protecting a water source. Actions taken by water system management, surrounding landowners, and the larger community are key to achieving comprehensive protection.

B. Description of the Montgomery Water System

The Montgomery Water System is a Public Community Water System that serves 189 connections to both residences and businesses. There is a year-round residential population of approximately 1200 people. Montgomery Elementary School is the most critical customer on the system.

Montgomery Water System Source Protection Plan

A submersible Gould 3-phase pump (10 HP) is used in Well R. The raw water mains only include the 2-inch galvanized iron and 4-inch ductile iron supply line from the well into the building to the filter. There is no raw water storage.

The distribution system is composed of 8-inch cement lined ductile iron water main, 4-inch cement lined water mains, and 2-inch copper service lines. Each of the service connections has an individual water meter. There are approximately 45 fire hydrants connected to the distribution system. The water system has three storage facilities:

Tank #	Tank Name	Size	Type	Location
ST001	Fuller Bridge	150,000 gallon Two cell	Partially Buried Concrete	South Richford Road
ST002	Route 242	240,000 gallon Two cell	Buried Concrete	Route 242
ST003	Regan Road	5,000 gallon	Buried Concrete	Regan Road

The water pressure is maintained by the elevation of each of the storage tanks in the system. The system requires a booster pump station to pump from the Fuller Bridge storage tank pressure zone to the Route 242 storage tank pressure zone. In addition, a booster pump station is required from the Route 242 storage tank pressure zone to the Regan Road storage tank pressure zone. The booster pumps are located on School Drive (Route 118 Booster Pump Station 001 – two pumps) and near the Howard Road and Route 58 intersection (Route 58 Booster Pump Station 002 – one pump).

The average daily demand (given in the permit and based on population calculations) is 38,000 gallons per day (GPD). Based on meter readings, the actual ADD is closer to 30,000 GPD. The maximum daily demand is 76,000 gallons per day. The system has disinfection by continuous chlorination and a second chlorine boosting facility to maintain the residual. After disinfection, the water is filtered through greensand to remove manganese. Table 1 provides more information on the water system.

Well R (WL003) was initially permitted to operate in 2005. The most recent Permit to Operate was issued by the State Water Supply Division July 12, 2016 with no expiration date. (Appendix G).

The most recent Sanitary Survey Inspection was performed in May 2, 2024 and the water system is addressing the findings. The System addressed two non-critical deficiencies and one significant deficiency identified by the survey of December 18, 2015. (Appendix H)

The initial Source Protection Plan (SPP) for the new well, WL003, Well R, was approved October 8th, 2005. Revisions are required every three years. The State issued approval of the last revised SPPU, on May 22, 2017 (Appendix I). The water system submitted a draft update for review on 2/26/2021 for the SPPU due on June 1, 2020. This most recent 2026

**Montgomery Water System
Source Protection Plan**

update incorporates the review comments of the Division as well as corrected SPA Maps and updated information since the 2021 submittal.

In April 2026, the Drinking Water and Groundwater Protection Division (DWGPD) staff discovered the need to correct the well location on the ANR NR Atlas during the review of a floodplain restoration project proposed by the Franklin County Natural Resources Conservation District (NRCD) and Town of Montgomery which design details included location of the proposed project within the SPA of the water system; design for a floodplain restoration project in Montgomery at the confluence of Black Falls Brook and the Trout River. Geocoordinates gathered during the 2024 Sanitary Survey were used to update the Division's well database record and ANR NR Atlas. Corrections to the well location required adjustments to the SPA boundaries as displayed on the ANR NR Atlas mapping tool. On April 22, 2026 the ANR NR Atlas mapping layer for public water system SPAs and public water sources was corrected by DWGPD staff. SPA Maps are created using the corrected information.

Table 1. Summary of System Information

System Name	Montgomery Water System
Water Supply ID Number	WSID 5125
Public System Type	Community
Number of Connections	189
Population Served	About 500
Average Daily Demand	30,000 gallons per day
Type(s) of Treatment	Chlorination and Green sand (manganese)
GWUDI? (Under Influence of Surface Water)	No Determination on October 10, 2005
Permit To Operate Expiration Date	11/1/15, last amended July 12, 2016 with no expiration date.
Last Sanitary Survey	12/18/2015, most recent 5/2/2024
System Contacts	Operators - Simon Operation Services – Ross Dunham Responsible Person – Mark Brouillette Owner – Town of Montgomery

Montgomery Water System
Source Protection Plan



Montgomery Water Plant Entrance



Back of Water Plant

II. SOURCE AND PROTECTION AREA DESCRIPTIONS

The Town of Montgomery is located in the northwestern part of the State of Vermont in Franklin County. Montgomery, known as the Covered Bridge Town, covers a total of 57 square miles – which includes numerous streams and brooks. Due to the proximity of the Green Mountains, it is surrounded by steep, forested, mountain slopes that are drained by the Trout River and its tributaries.

A. Town Geology and Soils

The Town of Montgomery is located along the foothills of the Green Mountains. Geological events that have occurred in the distant past directly affect the development of the Region's landscape. The Northwest Region is underlain by bedrock formed from sediments and volcanic materials deposited some 600 million years ago. The bedrock was then altered from the heat and pressure of mountain building. During the glacial period, which ended approximately 11,000 years ago, the Green Mountains were dominated by ice. This has also affected the lay and the look of the land.

The regional bedrock geology is mapped as the Jay Peak member of the Underhill formation, described as silver-green, quartz-sericitic-chlorite-albitic schist, locally quartzitic (1961 Centennial Geologic Map of Vermont).

The Town of Montgomery is home to soils that formed in glacial till in the Green Mountains and on uplands. The most common soil associations that are found in Montgomery are the Lyman-Marlow-Peru association and the Peru-Marlow association. The well is located in an area with agricultural soils. Most of Zone 1 and Zone 2 of the source protection area is composed of prime agricultural soils with a few sections of soils with statewide agricultural importance.

B. Description of the Montgomery Water Source

Well R – Source WL003 – is a permanent, full time source for the Montgomery Water System. The drilled, bedrock well is located just northwest of Montgomery Village. The location is just west of Fuller Bridge Road, north of North Main Street. The altitude of the well is approximately 525 feet.

This well was drilled during April 2004 by H.A. Manosh (tag # 26337). The well is 375 feet deep with 127 feet of six-inch steel casing. The driller's report shows 125 feet before bedrock was reached – with 8 feet of gravel followed by clay down to 110 feet and then sand and gravel between 110 feet and 125 feet. Beyond 125 feet is green bedrock with some water, soft spots, and broken up rock at various depths.

The static water level in the well is 60 feet. The driller's estimated yield is 100 GPM. Based on a step test and 96-hour pump test, the approved yield for the well is 74 GPM.

Based on well construction and distance to surface water, Well R qualified for an exemption from the MPA testing requirement. Therefore, the well was deemed not to be under the direct influence of surface water by the Water Supply Division on October 10, 2005.

Table 2. Summary of Well Information

WSID	System Name	Source Number	Source Name	Source Use	Type	Depth (feet)	Casing	Date Drilled	Yield (GPM)
5125	Montgomery Water System	003	Well R	Permanent Full Time	Bedrock	375'	6" steel 127 feet	2004	100 GPM (permitted)
5125	Montgomery Water System	001	Old Well	Emergency – Inactive-non-permitted	Bedrock	173'	8" steel 121 feet	1977	25 GPM (formerly permitted)



Montgomery – Well R Cover



Montgomery Wellhead

The Montgomery Water System has one well that is an emergency water source. The Water Supply Division must be notified prior to any use of this non-permitted, unapproved source. Details on this bedrock well are available in Table 2. The well location for WL003 was recently corrected in the ANR NR Atlas mapping layer on 4/22/2026 by the DWGPD based on geocoordinates gathered in the field during the 2024 Sanitary Survey conducted with the DWGPD and system operator.

C. Description of the Source Protection Area

A Source Protection Area is defined as “the surface and subsurface area through which contaminants are likely to move toward and reach water supplies” (Vermont Water Supply Rule). The purpose of delineating a Source Protection Area is to determine the recharge area that supplies water to a public water source. The recharge area or Source Protection Area for a groundwater source is defined by the nature of subsurface flow and that induced by pumping. Within a Source Protection Area, land uses and/or naturally occurring materials may cause a public water system to be vulnerable to contamination. While naturally occurring contaminants can usually be controlled by treatment methods, potentially contaminating land uses can be managed by activities outlined in a Source Protection Plan. A Source Protection Plan identifies water system vulnerabilities and enumerates techniques to manage potentially contaminating land uses.

Source Protection Areas for Public Community Water Systems may be delineated using the following methods:

1. Calculated fixed radius
2. Simplified variable shapes
3. Analytical methods
4. Hydrogeologic mapping
5. Flow models

The Source Protection Area of Public Community Water Systems is further classified into three zones:

- Zone 1 – 200-foot radius around well
- Zone 2 – Estimated zone of influence with “probable impacts”
- Zone 3 – Remainder of recharge area with “possible impacts”
- 2-year travel time for sewage disposal - A two-year travel time zone is used to identify a protection area to provide adequate protection from pathogen threats resulting from onsite disposal of sewage. The Two-Year Time of Travel zone is separate from the three SPA zone boundaries.

Zone 1: is a 200-foot radius around the well, also known as the sanitary radius. This is the area where impacts are likely to be immediate and certain. The Sanitary Radius is the most critical area for protection. Only activities that are related to the water system should occur within the sanitary radius. The sanitary radius should be under the control of the water system.

Montgomery Water System Source Protection Plan

Zone 2: Consists of contributions from the monitoring radius as established as part of the Source Interference Testing for new systems and outside Zone 1. This zone is based on criteria such as water usage and pump test rate and is the area where impacts are probable from potential sources of contamination.

Zone 3: Is the outer most boundary of the Source Protection Area. Zone 3 consists of the remaining recharge area not delineated in Zone 2 and is the area where possible impacts from potential sources of contamination may occur. This area may also be thought of as the area supplying recharge to the public source simply by natural groundwater flow.

Two-Year Time of Travel: A minimum travel time of two years must exist in the materials between a potential source of contamination that may contain pathogenic microorganisms and the drinking water source. The two-year travel time is based on the reasonable assurance of pathogen attenuation.

Well R (Source 003)

The source protection area for Well R was hydrogeologically delineated. Hoffer Consulting Inc. used recharge and infiltration calculations to recommend a delineation for the source protection area on August 25, 2005. The delineation letter from Hoffer Consulting to the Water Supply Division is included in Appendix E. The public notice and SPA Map for the proposed SPA was issued by the Water Supply Division on September 13, 2005. The Source Protection Plan approval for the new well, WL003, (well R) was issued on October 8, 2005 under the Source Permit E-1133 issued on October 10, 2005.

Zone 1 was determined to be a 200-foot sanitary radius around the well. Zone 2 is a much larger circle, with a radius of 710 feet. With a groundwater flow assumed to be downgradient, Zone 3 is a larger recharge area to the northeast of the wellhead. Zone 3 shares two boundaries with the Black Falls Brook watershed – extending to 2500 feet upgradient from the wellhead.

The Montgomery Water System Source Protection Area was recently corrected on the ANR NR Atlas in conjunction with the correction to the water source well location on April 22, 2026.

The area of the SPA is of mixed use; approximately one-third of the land is forested, one-third is farmland, and one-third is residential. There are three town roads within the SPA. Black Falls Brook is the only surface water located within the source protection area. The total source protection area is approximately 144 acres (0.23 square miles).

Zone 1 consists of open land, the water plant, and meadow; there are no surface waters or roads. The Town of Montgomery owns the majority of Zone 1.



Montgomery SPA Zone 1



Montgomery SPA Zone 2

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III. INVENTORY OF POTENTIAL SOURCES OF CONTAMINATION AND ASSESSMENT OF THREATS

In order to assess current and future impacts from land uses in the Source Protection Area, past land use was reviewed, planning options were examined, and a review of current property owners and their associated land uses was conducted. This information has been combined for the current inventory of Potential Sources of Contamination for Well R.

Land use policies in the 2010 Montgomery Town Plan include protecting “water quality by limiting development in Wellhead Protection Areas, wetlands, and along stream banks.” The plan also details various Vermont statutes and policies on groundwater and drinking water source protection.

After the Potential Sources of Contamination inventory was completed, PSOCs were ranked “Low”, “Medium” or “High” based upon factors such as: distance to source, toxicity of element, elevation, and geology. High risk PSOC’s include those sites of known contamination and prohibited uses within Zone 1.

A. Montgomery – Well R

Current land uses identified with the Source Protection Area for the Well include: forested, agriculture and residential development. There are a total of 50 parcels of land within the source protection area. The town owns three of these parcels that include much of Zone 1 and Zone 2 in the source protection area. Categories of potential sources of contamination for this well include septic, heating, roads, agricultural fields, flooding, and recreation. In addition, there is a slight chance that contaminants could be introduced into the groundwater through the private drinking water wells serving several nearby residences and the old village wells.

B. Potential Sources of Contamination

The potential sources of contamination for this well are within the categories of agriculture, residential, recreation, transportation, and surface water. There are five PSOCs total - with medium risks and low risks. For details on the potential sources of contamination for the Montgomery well, see Table 3.

In 2026, the town is working with the Franklin County Natural Resources Conservation District (NRCDD) on a proposed floodplain restoration project in Montgomery at the confluence of Black Falls Brook and the Trout River. The design details include the location of the proposed project within the SPA of the water system. The consultant is alerted to the SPA and requested to locate all staging areas and project activity outside of the zone 1 boundary. The project proposes to use a portion of the existing pump house/ treatment facility gravel access road and extending a temporary access through zones 1 and 2 to get to the flood restoration site along the riverbank. The project’s temporary access will be returned to its original condition at the close of the project. Unpaved unsalted seasonal access is permitted in the zone 1 area under the VT WSR.

Table 3. Potential Sources of Contamination Inventory and Risk Evaluation

PSOC #	PSOC Description	Property Use	SPA Zone	PSOC's	Risk
1	Residences in the area: Septic (all), heating oil (some), private wells	Residential	2 & 3	Bacteria Nitrates VOC's other	Medium
2	Agricultural fields: Hayfields (manure spread); one corn field and former corn field in Zone 1 (now abandoned)	Agriculture	1, 2, 3	Bacteria Nitrates VOC's other	Medium
3	Roads: paved and unpaved Green Mountain Rd, Fuller Bridge Rd, Brook Road ACCESS Road to Pump House	Transportation	2 & 3 1 & 2	Sediment Road Salt VOC's	Low High
4	Recreation: VAST Trail, hunting, sugaring	Recreation	3	Sediment VOC's	Low
5	Surface Water: Black Falls Brook	Water	2 & 3	Various, flooding	Low



IV. MANAGEMENT OF RISK

After reviewing the potential sources of contamination inventory for the source, the water system developed a list of management priorities. These activities are discussed more specifically below.

A. Outreach and Education

The system has started doing public education and outreach to landowners. Public education and outreach are central to the plan because increased awareness leads to better management of contamination risks within the Source Protection Area. An open house at the well building and treatment plant has been done and will be repeated periodically. Zone 1 landowners have been approached and notified of their status. In addition, attempts are made on an ongoing basis to educate these landowners about ways to help protect the well through good environmental management practices.

A letter and map of the source protection area has been sent to all property owners located within the SPA, to notify them that their property is located within a SPA for a public water system. A list of property owners is provided in Appendix C. A copy of educational materials regarding relevant topics such as septic system maintenance and agricultural best management practices was sent with each notice. A sample letter is found in Appendix A.

A letter and copy of the SPP will be sent to local and regional planning boards and state agencies to notify them of the location of the public water source and the source protection area. A copy of an example letter is presented in Appendix B. This letter will be sent out within three months of receiving state approval of this plan. The mailing addresses are presented in Appendix D.

The Franklin County NRCD is working with the DWGPD to ensure project design of the Montgomery Floodplain Restoration Project meets isolation distances as prescribed in the VT Water Supply Rule and no prohibited activities will occur within the zone 1 boundary of the SPA. Best Management Practices will be used during the project. The Montgomery Water System Operator will monitor activity to ensure protection of the water source well.

B. Source Protection Area – Planning & Land Use

The Town of Montgomery completed a town plan which was updated during 2010. The plan includes information on the public water system that was current at the time. Rural Water will contact the town office and regional planning commission regarding the inclusion of the current information on the system in the next update of the town plan. Data on the source protection area should also be included.

At this time, there is no zoning or overlay protection for the wellhead and source protection area at Well R. These are some of the best options for long term protection of the groundwater and aquifer serving the community water system.

In order to ensure future protection of the well, Montgomery may also consider purchasing additional land in the source protection area, especially Zone 1. Funding assistance is available from the Vermont DEC Water Supply Division.

C. Contingency/Emergency Response/Security

Montgomery has recently made several changes that will enhance emergency preparedness. The system has a State approved operations and maintenance manual, which is also useful in emergency situations. The wellhead, pumps, and tank areas should be inspected to determine if there are any low-cost ways to prevent tampering or possible contamination of the water supply. The system and local landowners have agreed that security will be enhanced by not posting signs that could identify the water source or source protection area.

D. Source Water Protection – Plan Updates

The system operator and administrative contact will oversee implementation of the measures outlined in this Source Protection Plan. System representatives may also comment on development proposals that are located within the Source Protection Area. After the management activities in this plan have been implemented, a designated representative should review the plan once per year. The system operator will perform an inspection of the SPA every three years to confirm that all parties are following best management practices, and to identify any changes in land uses or property owners. Updates indicating any changes in land use or PSOC's will be submitted to the Water Supply Division. Visit the DEC Drinking Water and Groundwater webpage at <https://dec.vermont.gov/water/drinking-water/public-drinking-water-systems/source-water-protection> for information on updating the plan.

The Montgomery Water System reserves the right to amend or update this plan before the three-year submittal cycle has been completed.

V. CONTINGENCY PLAN

The Contingency Plan outlines the steps that the water system may take in the event that their well becomes contaminated, is at imminent risk of becoming contaminated (e.g., due to hazardous contaminant spill in the vicinity of the well), or declines in yield. The Vermont Water Supply Division considers a source to be in an emergency situation if the source experiences water quality problems or environmental releases. Examples of an interruption of service include power outages or mechanical failure. The plan may also be implemented if there are mechanical problems with the water system which require repair.

The above possible situations may result in a loss of water supply for a number of hours, days, weeks, or even permanently. The Contingency Plan specifies emergency response procedures including names and phone numbers of key people/officials that may be needed to solve the particular problem. The system will need to identify the appropriate people to call for each situation. In addition, short-term and long-term water supply alternatives are outlined. Being prepared for potential emergency situations will greatly improve the system's ability to address problems.

A. Water Supply Disruption Response Procedures

If an emergency occurs, such as a contaminant spill in the Source Protection Area or if a regulated compound is detected in the water supply above acceptable levels, the following notification procedure should be implemented.

Step 1: The person discovering the emergency situation will call the responsible person and/or the operator of the water system:

MONTGOMERY WATER SYSTEM	
SOS – Ross Dunham, Operator	(508) 776-7462 (cell) (802) 326-2278 (plant) (802) 741- 1828 (Pager)
Montgomery Town Clerk - Administrative Contact	(802) 326-4719

Step 2: The responsible person and/ or operator will then be responsible for notifying some of the following officials, depending on the nature of the situation:

EMERGENCY CONTACT LIST	
Statewide Emergency Services	911
Vermont State Police – St Albans Station	(802) 524-5993
Franklin County Sheriff	(802) 524-2121
Ambulance – Montgomery Rescue	(802) 326-4555
Montgomery Fire Department	(802) 326-4555

Montgomery Water System
Source Protection Plan

STATE CONTACT LIST	
Vermont Water Supply Division (Drinking Water and Groundwater Protection Division)	911 after hours (802) 828-1535
Vermont DEC Hazardous Materials Spills Hotline	(800) 641-5005
Vermont Department of Health	(800) 439-8550
VTrans St Albans – Maintenance District #8	(802) 524-5926

SERVICE/REPAIR NOTIFICATION LIST	
Local Plumber – Jeremy Rondo	(802) 744-6161W (802) 323-8540 Cell
Construction – SD Ireland	(802) 863-2222
Chlorine Supplier/Well Driller – Manosh	(802) 888-5722
Water Testing Laboratory – Enydne Laboratories	(802) 879-4333

TOWN CONTACTS	
Montgomery Town Clerk – Elizabeth Reighley	(802) 326-4719
Montgomery Health Officer – Suzanne Wilson	(802) 326-2105
Montgomery Select Board/Water Commission Chair – Charlie Hancock	(802) 326-2093 (Home) 617-548-3566 (Cell)
Montgomery Zoning Administrator Ellen Fox	(802) 326-9001
Montgomery Road Commissioner – Michael Snider	(802) 326-4418

It will be the RP's responsibility to determine who should be called on this list. If the RP is not available, the operator will assume this responsibility. Actions that may be considered include:

- Seeking advice from a consultant or the Vermont Water Supply Division
- Providing an alternate water source (bottled water, hauled water)
- Ordering repair equipment, or contracting for repair
- Remediating or cleanup related to a hazardous materials spill
- Providing water system treatment
- Implementing water conservation measures

B. Notification of Water System Users

In the event of a shutdown and use of an alternative source, the system operator will notify water users by one or more of the following methods:

- Letters delivered to all water users
- Door-to-door notification

- Public posting in common areas
- Posting on the Town web site

Users will be told the nature of the problem and expected duration. Short-term treatment options will be specified – such as boiling or do-not-drink orders. Notice of interruption of service for emergency repairs and maintenance is not typically required.

C. Short-Term Contingency Options

In the event that water from the Montgomery Water System is determined to be unsuitable to drink or use, the following situation may occur:

- The first option is to shut down the unsuitable source
- When the water is deemed unsuitable for drinking, the Water System Operator will issue a Boil Water notice and/or recommend that bottled water be utilized for drinking water purposes. In the event of a coliform hit, notification and sampling procedures from the Vermont Water Supply Division should be followed.
- When the water supply has been deemed temporarily unsuitable for use, the Water System Operator will issue a “Do Not Use” notice indicating that water is only to be used for flushing toilets. In addition, treatment alternatives should be considered.
- In the event that water quantity problems arise, conservation measures will go into effect.

Short-term water supply alternatives include bottled water delivery or bulk water delivery to fill the reservoir. Bottled water is available from the following suppliers:

BOTTLED WATER SUPPLIERS		
Vermont Heritage	Newport, VT	802-334-2528

A short term supply of water can be provided by filling the water tanks. A number of bulk water suppliers can provide 4000 to 6000 gallon loads. A water use restriction should be put in place to conserve supply in the event of water hauling. Sanitary tank truck delivery can be provided from:

BULK WATER SUPPLIERS		
Wright’s Plumbing	Derby, VT	802-334-6976
Clear Water Deliveries Stafford & Son Well Drilling	Jericho, VT	802-899-5873
A-1 Water Deliveries Wright Family Farm	St Albans, VT	802-524-9361
Fresh Water Haulers	Burlington, VT	802-658-2223

D. Long-Term Contingency Options

The Montgomery Water System has one well that is an emergency water source. The Water Supply Division must be notified prior to any use of this non-permitted, unapproved source. Detailed instructions for using this source are found in the O&M Manual – Section 6.3 Alternate Water Supply.

If the source becomes continuously unavailable due to quantity or quality issues, the system will initiate a program to determine future necessary steps. Decisions will be made to determine if, in the case of contamination, water can be treated until contamination is no longer present, or if the contaminated source will need to be abandoned.

If an existing source must be abandoned or permanently modified, long-term options include:

- Drilling one or more new wells
- Installing an appropriate water treatment system

In addition, the water system participates in the Vermont WARN network (Water/Wastewater Agency Response Network)– which will provide mutual aid from nearby systems during emergency situations.

E. Water System Shut Down & Start Up Procedures

If the contamination requires that the system well must be shut down for an emergency situation, the operator should follow the procedures outlined below:

Shut Down Procedures

The following steps must be completed, in order, to ensure the safe shutdown of the main water system.

- 1) Turn the well pump HOA switch to OFF on the motor control center.
- 2) Contact Pureflow to notify them that the filters will be out of operation if it is for more than a week. Periodic backwash of the filter media may be necessary.
- 3) If the filter system is the reason for the shutdown, close the gate valve in the water treatment plant that goes to the distribution system

Start Up Procedures

In order to start the operation of the water system, the following sequence of events must be completed, in order (this is a partial list – the full procedure is available in the O&M Manual Section 3.2):

- 1) Verify the appropriate panel breakers are ON and the touch screen display reads “Auto” for each component
- 2) Open the gate valve next to the filter skid and open all gate valves in the system that may have been closed
- 3) Verify that the well pump, feed pumps, filters, and storage tanks are operating properly

- 4) Verify that the pump station pump are set to “Auto”

VI. REFERENCES

Public Water System Permit to Operate
Montgomery Center Water System
WSID #5125
July 12, 2016

Operations and Maintenance Manual
Montgomery Water System
WSID #5125
June 2010

Vermont Water Supply Rule
Agency of Natural Resources, Department of Environmental Conservation
Revision Date January 1, 2026

Montgomery Town Plan
Amended and Adopted August 19, 2010

Montgomery Water System Source Protection Plan
Effective Date: June 2017

Online References:

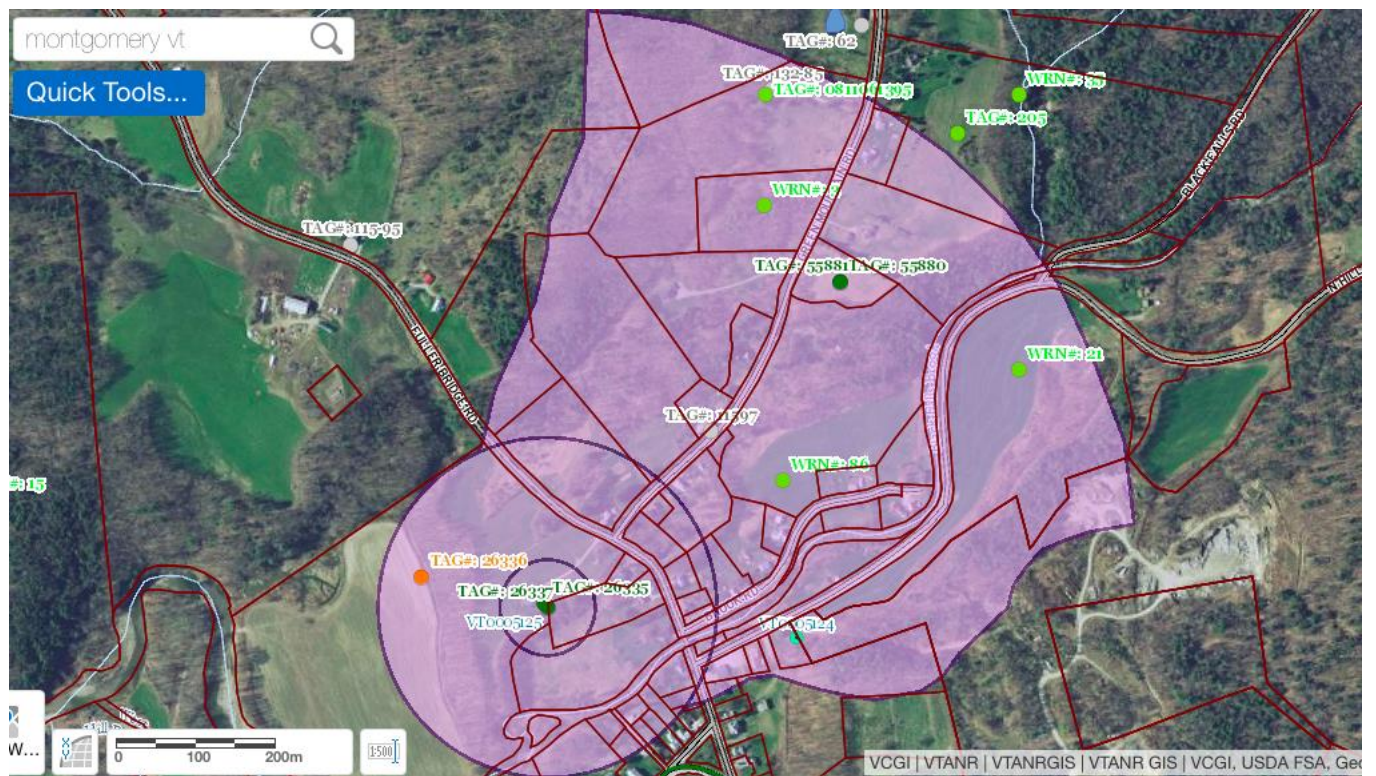
Vermont Water Supply Division
<https://dec.vermont.gov/water/drinking-water/engineering-and-water-resources>

Vermont Geological Survey
<https://dec.vermont.gov/vermont-geological-survey>

Northwest Regional Planning Commission
<http://www.nrpcvt.com/>

Vermont Rural Water Association
<http://www.vtruralwater.org/>

Montgomery Water System Source Protection Plan



SPA MAP to be replaced with corrected Map using ANR NR Atlas . Corrections to the ANR NR Atlas performed on 4/22/2026.

From: Ebby, William
Sent: Wednesday, April 22, 2026 8:04 AM
To: Ranker, Laura
Subject: SPA Update 5125

Hi Laura,

I've shifted the SPA location for 5125 to align with the corrected well coordinates provided during the 2024 sanitary survey. You should see changes to the SPA on the Atlas next week.

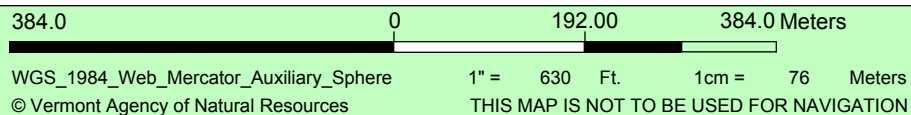
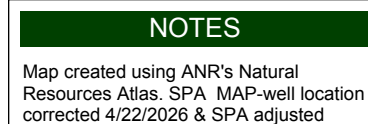
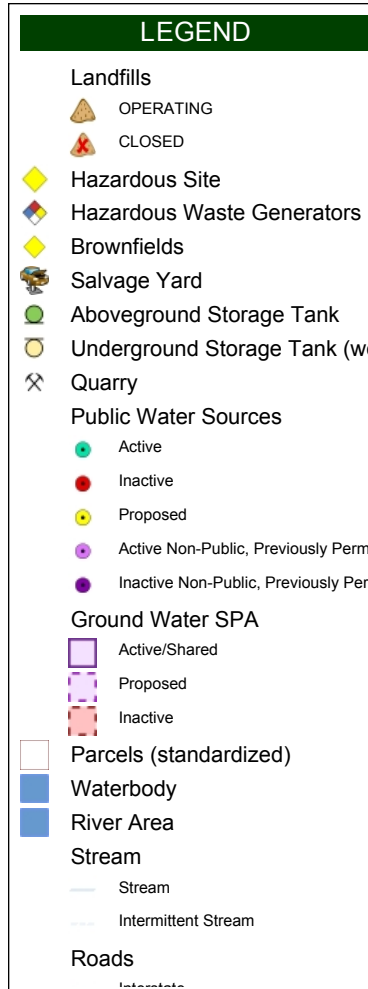


Lat: 44.90365° N
Lon: 72.64225° W

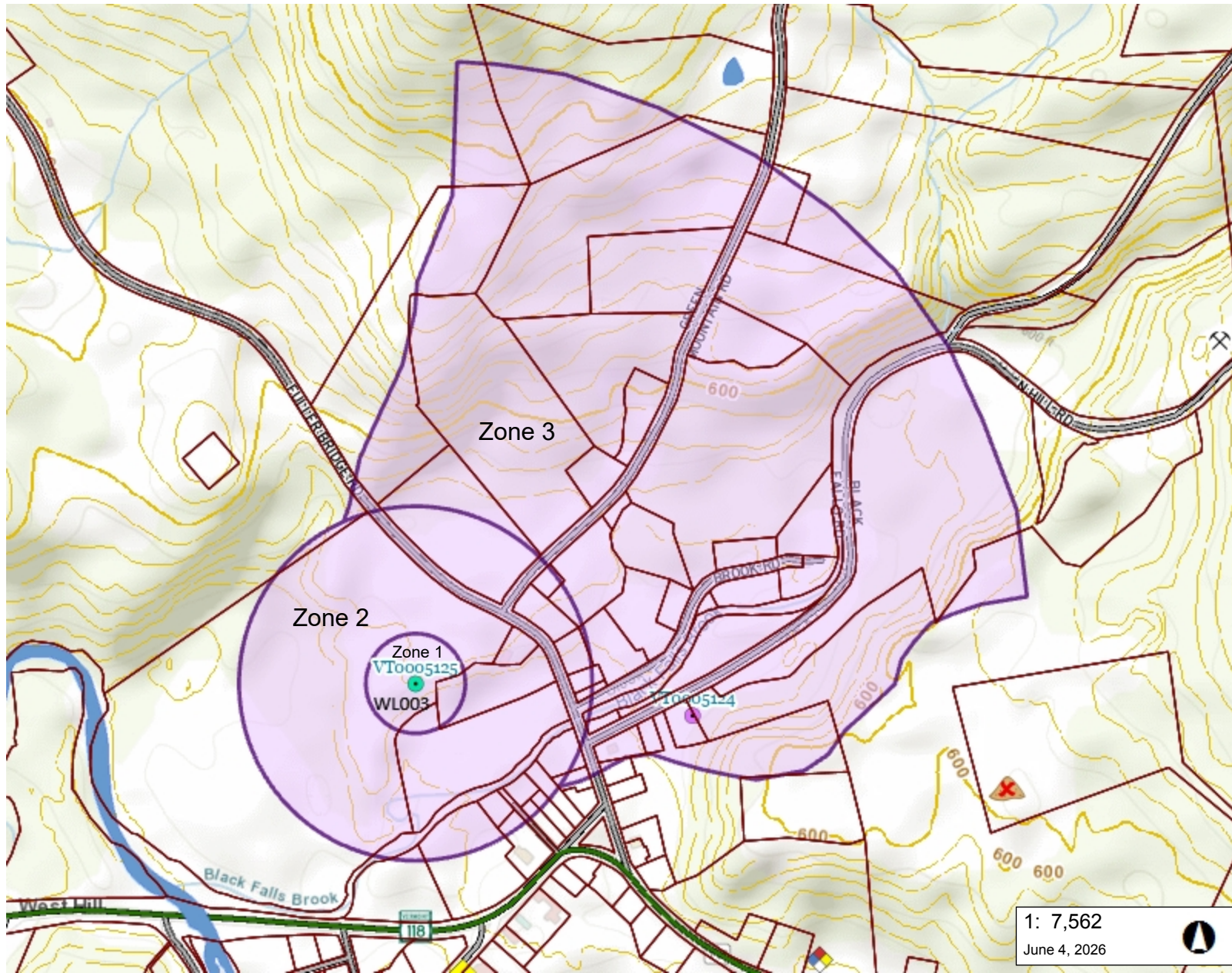
Let me know if you have any questions,

Will

Will Ebby | (he/him) | Source Protection Specialist
Department of Environmental Conservation
Drinking Water and Groundwater Protection Division
1 National Life Dr , Davis 4,
Montpelier, VT 05620
Phone Number: 802-261-5749
<https://dec.vermont.gov/drinking-water-and-groundwater-protection>



DISCLAIMER: This map is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. ANR and the State of Vermont make no representations of any kind, including but not limited to, the warranties of merchantability, or fitness for a particular use, nor are any such warranties to be implied with respect to the data on this map.



1: 7,562

June 4, 2026



LEGEND

-  Wastewater Discharge
- Landfills**
 -  OPERATING
 -  CLOSED
-  Hazardous Site
-  Hazardous Waste Generators
-  Brownfields
-  Salvage Yard
-  Aboveground Storage Tank
-  Underground Storage Tank (w/
-  Commercial Mining
-  Dredging
-  Gravel Mining
-  Dam
-  Ledge
-  Waterfall
-  Weir
-  Avulsion
-  Braiding
-  Flood Chute
-  Neck Cut Off
-  Migration
-  Animal Crossing
-  Stream Ford
-  Berm
-  Road
-  Improved Path

NOTES

Map created using ANR's Natural Resources Atlas.
SPA TOPO MAP

384.0 0 192.00 384.0 Meters

WGS_1984_Web_Mercator_Auxiliary_Sphere

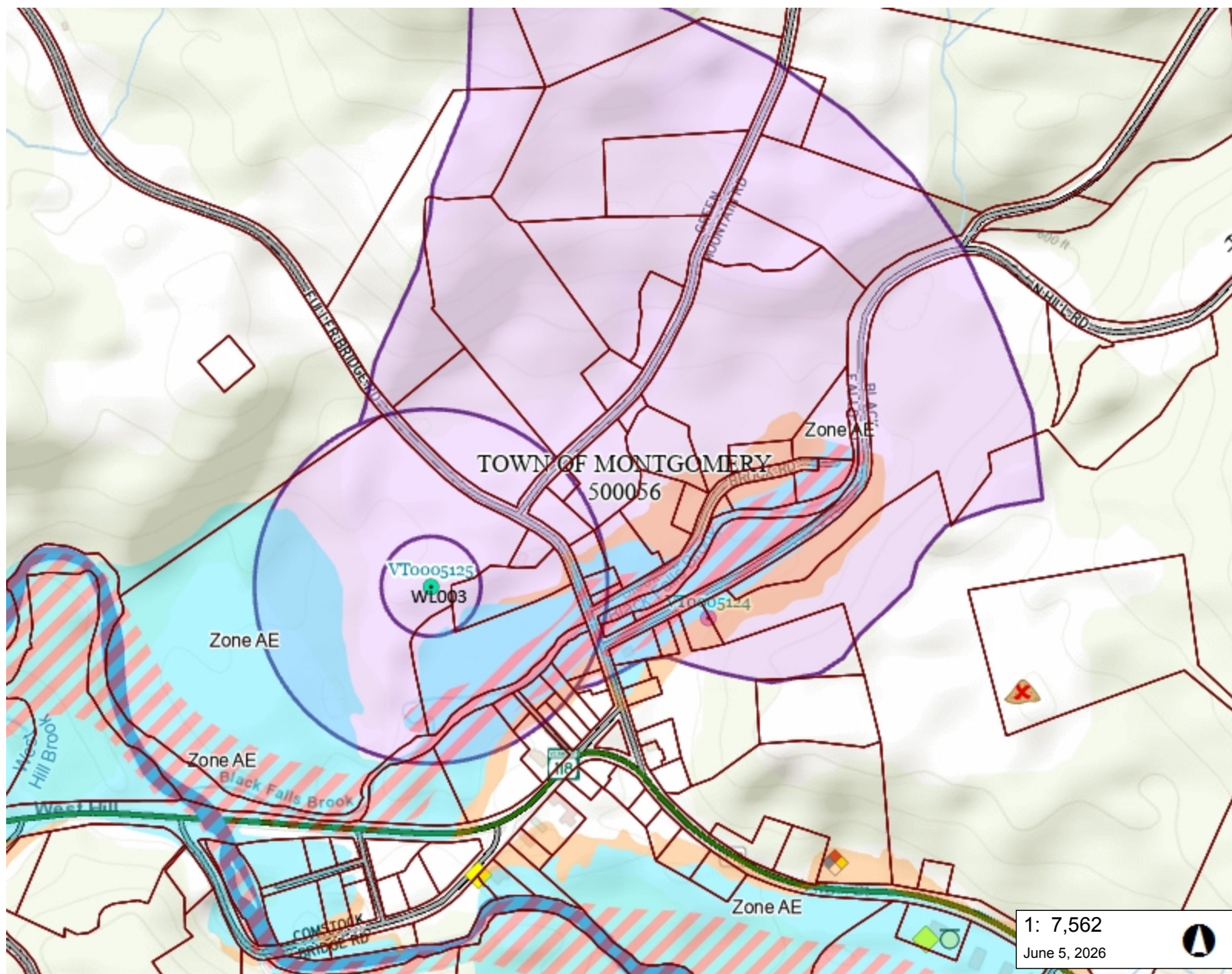
© Vermont Agency of Natural Resources

1" = 630 Ft.

1cm = 76 Meters

THIS MAP IS NOT TO BE USED FOR NAVIGATION

DISCLAIMER: This map is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. ANR and the State of Vermont make no representations of any kind, including but not limited to, the warranties of merchantability, or fitness for a particular use, nor are any such warranties to be implied with respect to the data on this map.



LEGEND

- Political Jurisdictions
- Profile Baselines
- Water Areas
- Flood Hazard Zones**
 - 1% Annual Chance Flood Hazard
 - Regulatory Floodway
 - Special Floodway
 - Area of Undetermined Flood Hazard
 - 0.2% Annual Chance Flood Hazard
 - Future Conditions 1% Annual Chance Flood Hazard
 - Area with Reduced Risk Due to Levee
 - Area with Risk Due to Levee
- Landfills**
 - OPERATING
 - CLOSED
- Hazardous Site
- Hazardous Waste Generators
- Brownfields
- Salvage Yard
- Aboveground Storage Tank
- Underground Storage Tank (w/Leak)
- Quarry
- Public Water Sources**
 - Active
 - Inactive
 - Proposed
 - Active Non-Public, Previously Permitted
 - Inactive Non-Public, Previously Permitted

NOTES

Map created using ANR's Natural Resources Atlas.
SPA MAP- Flood Hazard Zones

384.0 0 192.00 384.0 Meters

WGS_1984_Web_Mercator_Auxiliary_Sphere

© Vermont Agency of Natural Resources

1" = 630 Ft. 1cm = 76 Meters

THIS MAP IS NOT TO BE USED FOR NAVIGATION

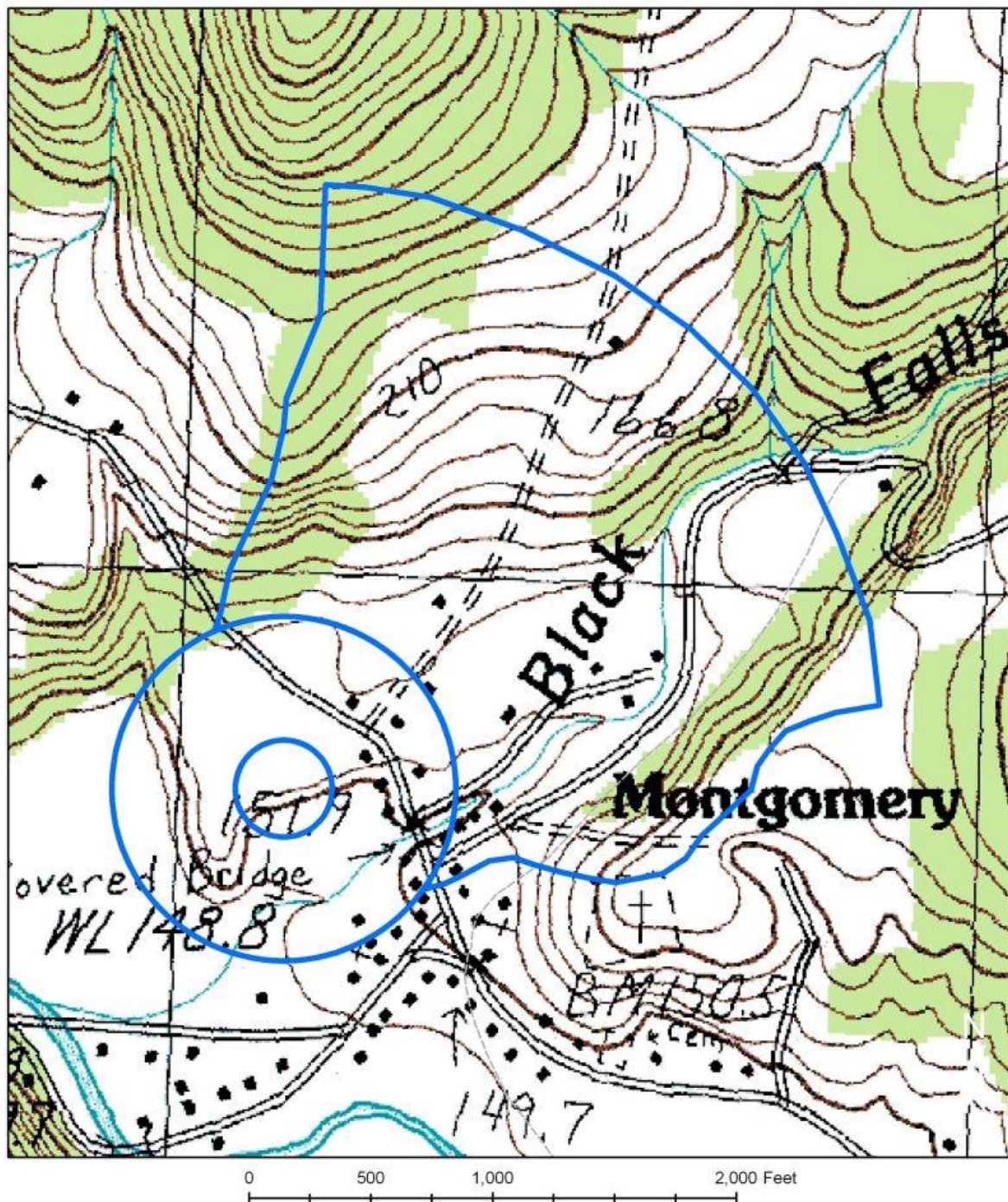
DISCLAIMER: This map is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. ANR and the State of Vermont make no representations of any kind, including but not limited to, the warranties of merchantability, or fitness for a particular use, nor are any such warranties to be implied with respect to the data on this map.

1: 7,562

June 5, 2026



Figure 2. Topographic Map –



**Montgomery Source Protection Area
WSID # 5125 - Montgomery, VT**

Data Sources: 1:24K Topographic Map from VCGI & USGS
DEC Water Supply & VT Rural Water; map created 5/09

Figure 3. Orthophoto –

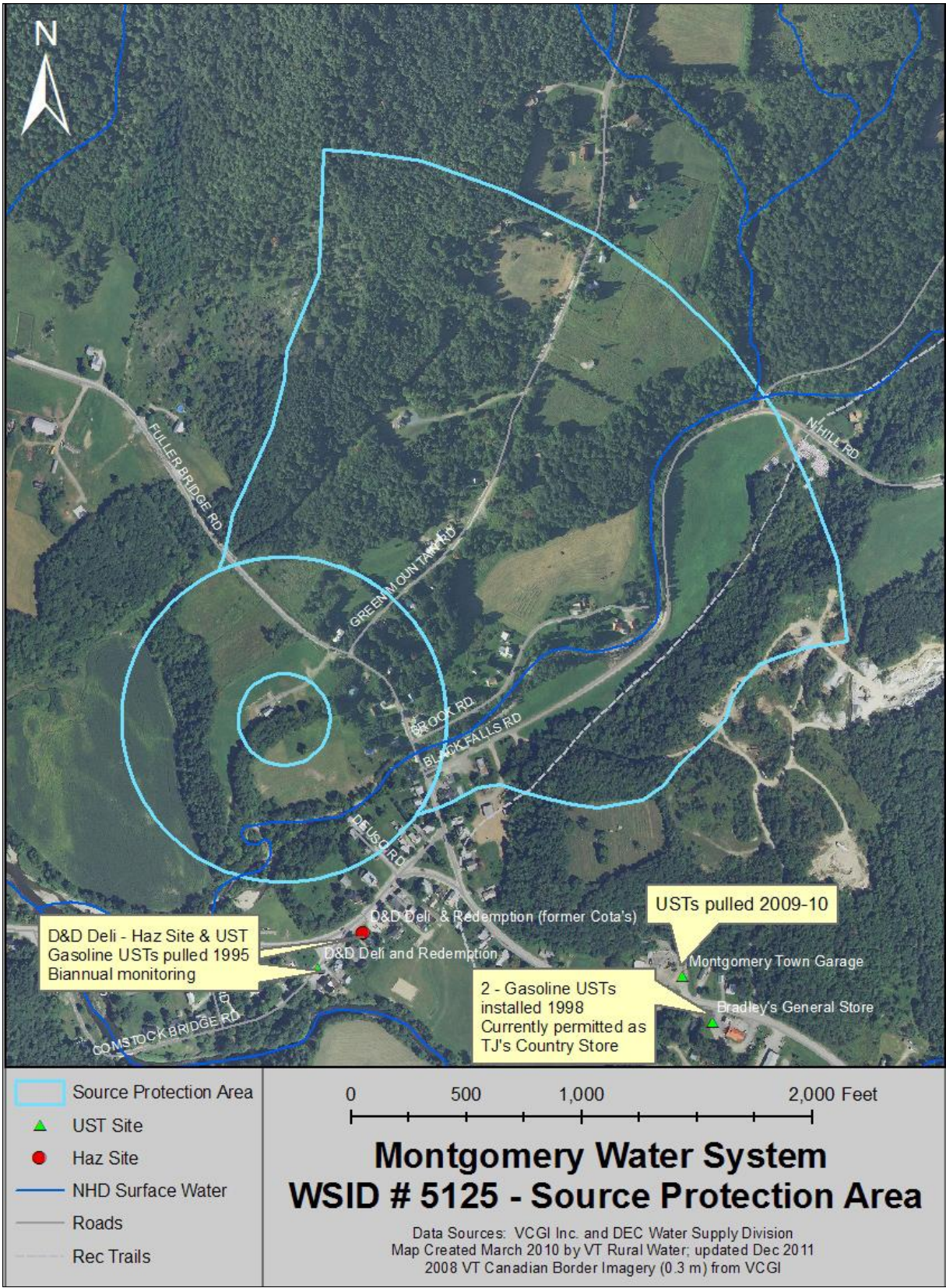


Figure 4. Potential Sources of Contamination Map

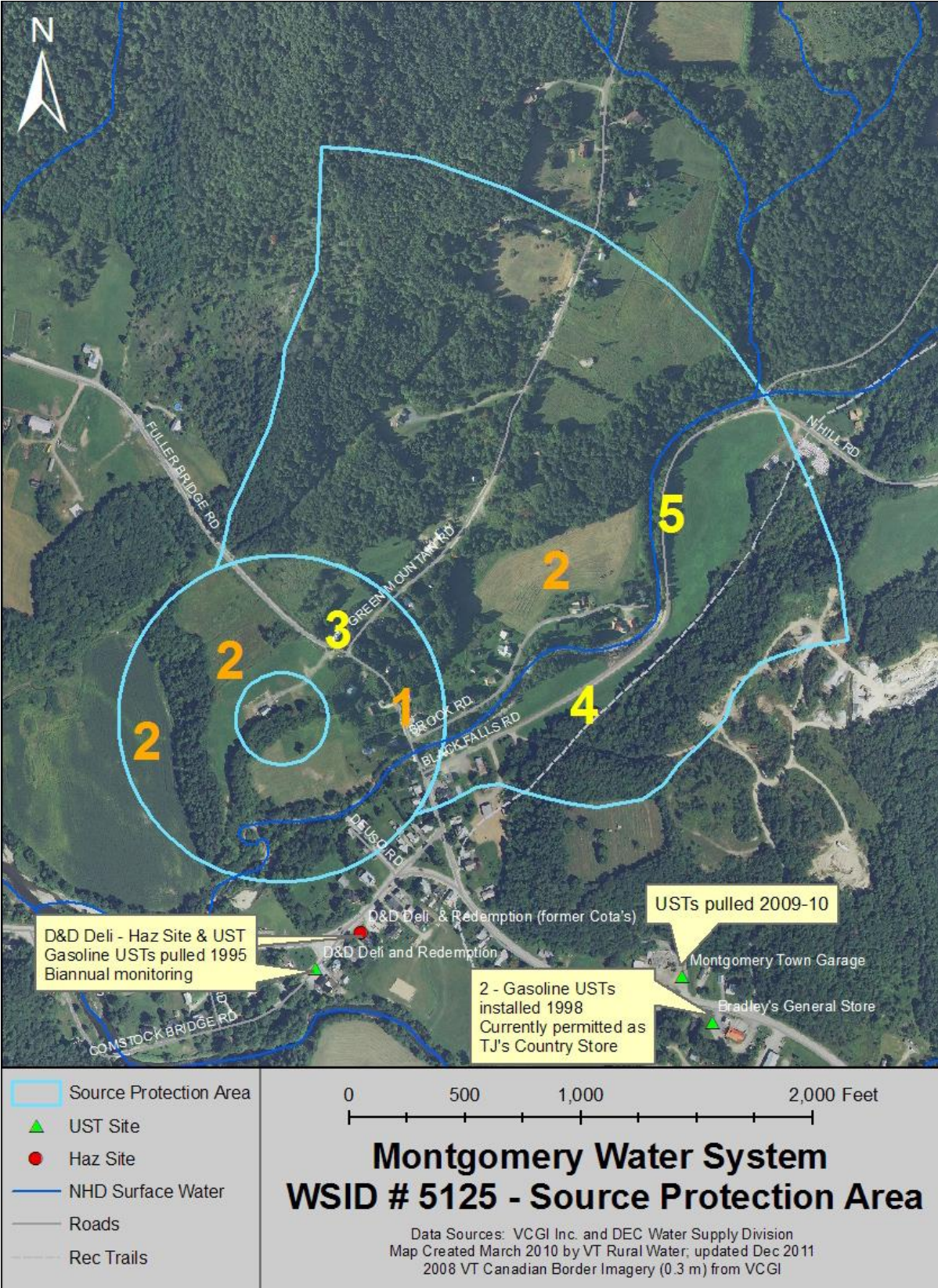


Figure 5. Parcel Map – Update Parcel Map as necessary

Town of Montgomery link to Town Parcel Maps: <https://mangomap.com/cartographic-technologies-inc/maps/133454/montgomery-vt-townview-online?preview=true#>



VIII. APPENDICES

Appendix A. Letter to Landowners

Montgomery Water Department
PO Box 442
Montgomery Ctr, VT 05471

July 2017

Dear Landowner,

As required by the State of Vermont, Montgomery Water Department has been working to renew our Source Protection Plan to protect our drinking water well. Montgomery is being assisted by the Vermont Rural Water Association, a non-profit group, to update this plan. The purpose of the plan is to identify potential contaminants and to manage and maintain the quality and quantity of our public drinking water source.

Your land is located in the source protection area (see enclosed map). If you own a home in the source protection area, you may have already been contacted to provide information necessary in the development of this plan. A source protection area is the land from which contaminants are considered likely to reach a well. Within a source protection area, human land uses and naturally occurring materials may cause a public water system to become vulnerable to contamination. While naturally-occurring contaminants can usually be controlled by treatment methods, property owners are often able to manage their land uses to further lower the risk of contamination.

Land use activities that occur within a Source Protection Area have the ability to negatively impact a water source. For example, activities such as improperly disposing of household hazardous wastes and motor oil, septic system failures, and spillage of gasoline or home heating fuel all have the potential to contaminate a water source. Many of the negative impacts associated with these activities can be avoided with good management.

If you have any questions, please contact the Montgomery Water Department at 802-326-4719 or the Water System Operator at 802-309-8574. Copies of our Source Protection Plan will be available for review at the Town Clerk's Office and the State of Vermont Drinking Water and Groundwater Protection Division in Montpelier.

Thank you in advance for helping us protect the drinking water in our community.

Sincerely,

Montgomery Water Commission

Appendix B. Letter to Public Officials

Montgomery Water Department
PO Box 442
Montgomery Ctr, VT 05471

July 2017

Dear State, Local and Regional Officials,

As required by the State of Vermont, Montgomery Water Department has been working to renew our Source Protection Plan to protect our drinking water well. The purpose of the plan is to identify potential contaminants and to manage and maintain the quality and quantity of our public drinking water source.

Enclosed is a map showing the Source Protection Areas for one well serving the Montgomery Water System. A Source Protection Area consists of the surface and subsurface area from or through which contaminants are likely to reach a water supply source. Land use activities located in the protection area have the potential to adversely impact water quality of the associated well. If the ground water that supplies our well becomes contaminated, it may be impossible to eliminate the contamination so that the source can continue to be used for drinking water. We are proactively trying to protect our water source by implementing a source protection plan of which this letter of notification is a part.

We are contacting you to request your assistance in protecting this water supply. There are a number of ways in which your agency may be able to help with protection that can help reduce the possibility of contamination of the water supply. For example, please keep us informed of any related land use decisions or permitting issues and involve us in the planning and decision process where it is deemed appropriate.

On behalf of the drinking water system, I would like to thank you for your attention to this matter. If you have any questions, please contact the Montgomery Water Department at 802-326-4719 or Operator at 508-776-7462.

Sincerely,

Montgomery Water Commission

Montgomery Water System
Source Protection Plan

Appendix C. Addresses of Source Protection Area Landowners

Town of Montgomery link to Town Parcel Maps: <https://mangomap.com/cartographic-technologies-inc/maps/133454/montgomery-vt-townview-online?preview=true#>

Information from: Town of Montgomery Parcel ID Map (Northwest Regional Planning) and 2011 Montgomery Grand List & Parcel List Names Reference. Two of the original 51 parcels were combined leaving 50 parcels in the protection area.

PARCEL ID	OWNER 1	MAILING ADDRESS	CITY	STATE	ZIP
00001.002X	WALKER TREVOR	PO BOX 12	MONTGOMERY	VT	05470
00001.005X	SCHLEY JAMES T	PO BOX 162	MONTGOMERY	VT	05470
00001.006X	ELKINS MAGGIE	PO BOX 235	MONTGOMERY	VT	05470
00001.007X	LUMBRA FRANCIS	PO BOX 74	MONTGOMERY	VT	05470
00001.008X	BACKMAN MURRAY	364 AV REDFERN	WESTMOUNT QUE	CANADA	H3Z 2G5
00001.009X	ST ONGE ARTHUR	PO BOX 65	MONTGOMERY	VT	05470
00001.011X	DOMINA KENNETH	PO BOX 212	MONTGOMERY	VT	05470-0212
00001.012X	PELLETIER SUZANNE	PO BOX 19	MONTGOMERY	VT	05470
00001.013X	RACINE PATRICK	PO BOX 145	MONTGOMERY	VT	05470
00001.014X	BARTSCH DONNA	PO BOX 25	MONTGOMERY	VT	05470
00001.015X	MAY ALLISON AND JOHN WITHERSPOON	PO BOX 173	MONTGOMERY CTR	VT	05471
00001.016X	TOWN OF MONTGOMERY	PO BOX 356	MONTGOMERY CTR	VT	05471
00001.027X	JACOB WEBSTER	PO BOX 161	MONTGOMERY	VT	05570
00001.029A	SIANO WENDY	FULLER BRIDGE ROAD	RICHFORD	VT	05471
00001.029X	BROUILLETTE MARK F	529 FULLER BRIDGE ROAD	RICHFORD	VT	05476
00005.002X	VITTUM NICHOLAS	PO BOX 98	MONTGOMERY	VT	05470
00005.003X	BARNARD ABRAM	PO BOX 191	MONTGOMERY CTR	VT	05471
00005.004X	HACKER RANDI	2043 NEW HAMPSHIRE ST	LAWRENCE	KS	66046
00005.005X	THOMAS STICH	7 MOSS GLEN LANE	S. BURLINGTON	VT	05403
00005.006X	CLOWES DOUGLAS	PO BOX 201	MONTGOMERY	VT	05470
00005.006Z	BOSLEY FRANCES J	PO BOX 84	MONTGOMERY	VT	05470
00005.007X	MURPHY TIMOTHY L	PO BOX 176	MONTGOMERY	VT	05470
00005.008X	HAYS STEPHEN E	175 FOREST PARK AVE	SPRINGFIELD	MA	01108
00005.011X	CREIGHTON, DAVID	3047 DE BRESLAY RD	MONTREAL, QUE	CANADA	H3Y 2G8
00005.013X	TRYHORNE DAVID K	374 GREEN MOUNTAIN RD	RICHFORD	VT	05476
00005.014X	CHARLES HAROLD E	GENERAL DELIVERY	MONTGOMERY	VT	05470
00005.015X	WOOLHOUSE LADDIE S	PO BOX 125	MONTGOMERY	VT	05470
00005.016A	MCGREGOR CAROL M	469 GREEN MOUNTAIN RD	RICHFORD	VT	05476-9410
00007.003A	TOWN OF MONTGOMERY	PO BOX 356	MONTGOMERY CTR	VT	05471
00007.003X	ST ONGE ARTHUR	PO BOX 65	MONTGOMERY	VT	05470
00007.005X	FAIRPOINT NEW ENGLAND	908 WEST FRONT VIEW	DODGE CITY	KS	67801
00007.008X	SOULE JESSE	PO BOX 35	MONTGOMERY	VT	05470
00007.021X	VON CONTA	PO BOX 347	MONTGOMERY CTR	VT	05471
00037.002X	LEBRUN, JOHN	67 TRAFALGAR DR, PLATTSBURGH, NY 12901	WARRENTON	VA	20186
00037.006X	HARROCKS JOHN M	PO BOX 186	MONTGOMERY	VT	05470
00037.008X	DEUSO VIVIAN	PO BOX 153	MONTGOMERY	VT	05470
00037.010X	GERSTEIN WILLIAM	504 LANSDOWNE AVE	MONTREAL QUE	CANADA	H3Y 2V2
00037.014X	BAKER MARILYN	PO BOX 95	MONTGOMERY	VT	05470
00037.015X	ST CYR SHEILA	PO BOX 53	MONTGOMERY	VT	05470

Montgomery Water System
Source Protection Plan

00037.018X	KENNISON DANA	PO BOX 106	MONTGOMERY	VT	05470
00039.002X	CARPENTER PATRICIA P	PO BOX 62	MONTGOMERY	VT	05470
00039.004X	WADE RENA	66 BRISTOL RD.	MEDFORD	MA	02155
00039.005X	TOWN OF MONTGOMERY	PO BOX 356	MONTGOMERY CTR	VT	05471
00039.006X	ELKINS FRANCIS F	18 ON THE COMMON	EAST BERKSHIRE	VT	05447
00039.008X	MAURACIE LEGAULT	308 S.MAIN ST	RICHFORD	VT	05476
00049.003X	DEUSO CHARLOTTE	PO BOX 24	MONTGOMERY	VT	05470
00049.004X	SHERMAN GEORGE D JR	PO BOX 102	MONTGOMERY	VT	05470
0N118.137X	MONTGOMERY HISTORICAL SOC	PO BOX 47	MONTGOMERY	VT	05470
0N118.139X	PAUL CHAUIN	75 NUTTING ROAD	MONTGOMERY CTR	VT	05471
0N118.149X	ZARTARIAN THERESE A	11 AIRFIELD DR, UNIT 15 RYE, NH 03870	MONTGOMERY	VT	05470

Appendix D. Addresses of Public Officials

**List of Local, Regional and State Agencies
(to receive letter and Source Protection Area Map)**

Montgomery Town Clerk Elizabeth Reighley PO Box 356 Montgomery Ctr, VT 05471	Montgomery Health Officer Sorenson, Colon PO Box 356 Montgomery Ctr, VT 05471
Montgomery Zoning Administrator Ellen Fox PO Box 356 Montgomery Ctr, VT 05471	Montgomery Select Board Chair Charlie Hancock PO Box 356 Montgomery Ctr, VT 05471
Montgomery Road Commissioner Michael Snider PO Box 356 Montgomery Ctr, VT 05471	Northwest Regional Planning Commission 155 Lake Street St. Albans, VT 05478
VT Drinking Water and Groundwater Protection Division Dept of Environmental Conservation 1 National Life Drive, Davis Building 4 th Floor Montpelier, VT 05620-3521 802.828-1535	

Appendix E. Hoffer Consulting Letter on Water Quality and SPA Delineation

Jul 14 09 04:13p

Montgomery Water Dept

18023262278

p.3



HOFFER CONSULTING INC.

PO Box 122
East Burke, VT 05832
(802) 626 - 3077

Groundwater Supply Development
Hydrogeologic Site Investigations
Contaminated Site Remediation
Downhole Video Surveys

3427

August 25, 2005

Ken Yelsey, Regional Manager
Water Supply Division
103 South Main Street/Pantry Building
Waterbury, VT 05671-0403

Re: Town of Montgomery Well R, Well Interference & Water Quality Issues
Preliminary Source Protection Area Delineation
PID #E-1133

Dear Ken:

This report summarizes water quality and well interference issues for the Montgomery Water System's Well R. A preliminary source protection area is also presented for your review and comment. Figure 1 is a site location map.

WELL INTERFERENCE ANALYSIS

Per the Water Supply Rule, interference on neighboring wells is determined by calculating drawdown from the source well pumping at the approved rate for 180 days at average day demand plus 3 days at the maximum day demand. In most cases, water-level data from an individual well is used to calculate the interference effects on that well, either by an extension of the drawdown trend and/or using well equations and aquifer coefficients derived for the well. If no water-level data is obtained for a well, a generally accepted procedure is to substitute aquifer coefficients derived for the closest well from which data is available.

As mentioned in previous correspondence, water-level data collected from private wells within 2500 feet of Well R during the 96-hour pumping test cannot be resolved for a valid interference analysis. However, there is some usable water-level data from two nearby observation wells. These two observation wells are bedrock wells that were drilled on Town property as part of the initial drilling efforts. The drawdown trends observed in these wells can be used to estimate interference in the aquifer under the future design pumping of Well R.

Figure 2 identifies locations of known water supplies within 2500 feet of Well R, and Table 1 summarizes available information for each source. An assumption of this interference evaluation is that the shallow dug wells are not in direct hydraulic connection with the bedrock aquifer tapped by Well R. This assumption is based on the fact that Well R's water-bearing zones are located deep within the bedrock aquifer, at depths of 146-147 feet and 260-268 feet. In addition, the depth to bedrock at Well R is 125 feet, with a thick sequence of clay from 8 to 110 feet. The static level in Well R is relatively low, on the order of 55 to 60 feet below ground surface. Most of the shallow dug wells appear to be constructed within overburden materials, at altitudes higher than the static level in Well R.

During the 96-hour pumping test conducted on Well R in July of 2004, the well was pumped at an average rate of 74 gpm with a maximum drawdown of only 27.51 feet (static level of 57.75 feet to a final

GROUNDWATER SUPPLY & ENVIRONMENTAL SERVICES

Ken Yelsey
August 25, 2005
Page 2

level of 85.26 feet). Well R was the third of three bedrock wells drilled on the Town property. The first two wells were relatively low yielding, more characteristic of the well yields of the private bedrock wells in the area. The "Upper Field" observation well is located 225 feet west of Well R and is 299 feet deep with a driller's yield of 2.0 gpm (Tag #26335). The "Lower Cornfield" observation well is 440 feet west of Well R and was also drilled to a depth of 299 feet with a 1/2-gpm driller's yield (Tag #26336). Well locations are included on Figure 3, an orthophotograph of the well site that shows all bedrock wells within 2500 feet of Well R.

Water levels measured in the two bedrock observation wells during the pumping test are given on Table 2, and Figure 4 is a semi-log plot of drawdown for these two wells. Transmissivity (T) and storativity (S) values were calculated for the observation wells using the Jacob straight-line method. Table 3 summarizes the T and S values calculated for the observation wells, and also a T value for Well R.

Using the observation well T and S values, and an approved pumping rate of 74 gpm, drawdown in the aquifer at various distances from Well R was calculated using the Jacob modification of the Theis equation. Drawdown was calculated after 183 days of Well R pumping continuously at 37 gpm (to simulate 180 days of Well R pumping 74 gpm for 12 hrs/day), plus the drawdown from 3 days of pumping continuously at 37 gpm. Table 4 summarizes these calculations, and the results are illustrated on Figure 5 in the form of a distance-drawdown chart. Of the two observation wells, the drawdown calculated using the Upper Field well coefficients is greater. Figure 6 illustrates aquifer drawdown under the design pumping of Well R, using the more conservative data from the Upper Field well.

Interference drawdown on the bedrock wells within 2500 feet of Well R is calculated on Table 5, using the T and S values from the Upper Field well and the Jacob modification of the Theis equation. An approved pumping rate of 74.0 gpm for Well R is used. These calculations show 180 + 3 day interference drawdown ranging from 15.90 feet in the St. Onge well to 8.69 feet in the Charles well.

Table 6 provides calculations of the effect of the predicted interference on each well. The total available head (TAH) is calculated for each well, which is then reduced by the amount of interference predicted on Table 5. The reduction in TAH, as a percentage, is then subtracted from the well yield and also from the borehole storage volume. The remaining available water, in gallons per day, is then compared against an estimated daily demand of 600 gallons per day (assuming 4 bedrooms x 150 gpd/bedroom). These calculations show that all of the bedrock wells will retain sufficient yield to meet expected demands.

In summary, interference calculations indicate that Well R will not cause undue interference on the surrounding bedrock wells.

WATER QUALITY

Copies of all water quality testing results for Well R are compiled in Appendix A. The original laboratory report sheets are enclosed separately.

Table 7 compares drinking water standards against the Well R results from the initial 96-hour pumping test sampling (July 2004), and the initial follow-up sampling (September 2004). Table 8 summarizes results for all sampling events, and includes field measurements, radionuclides, and selected inorganics.

The initial Well R samples were collected at the conclusion of the 96-hour pumping test conducted in July of 2004, at a rate of 74 gpm. This sample showed a uranium activity of 51 +/- 2 pCi/L per liter.

Ken Yelsey
August 25, 2005
Page 3

(pCi/L), which was translated by the laboratory to a concentration of 76 +/- 3 parts per billion (ppb). A uranium concentration of 76 ppb exceeds the USEPA maximum contaminant level (MCL) of 30 ppb, and the Vermont standard of 20 micrograms per liter (equivalent to 20 ppb). The only other parameter to exceed drinking water standards was manganese, which was detected at concentration of 0.27 mg/L, exceeding the secondary standard of 0.05 mg/L.

Follow-up radionuclide sampling of Well R was conducted on September 22, 2004, using a small capacity well pump. Well R was pumped for approximately one hour at a rate of 10 to 12 gpm prior to collecting the sample. In addition, a sample was collected from the closest observation well (Upper Field observation well, Tag #26335) using the small capacity pump and pumping this well for 15 to 20 minutes at 10 gpm. These samples were analyzed for radionuclides by the same laboratory that conducted the initial Well R testing. The reported uranium result for Well R was much lower than the initial sample; 4.0 +/- 0.4 pCi/L or 6.0 +/- 0.6 ppb. Even lower uranium concentrations were found in the nearby observation well, 2.1 +/- 0.5 ppb.

Our initial reaction to the disparity in uranium concentrations between the two sampling events was to contact the laboratory (SCITEST) to have them review the data. KNL Laboratory Services, who was sub-contracted by SCITEST, conducted the radionuclide analyses. KNL had retained portions of the initial pumping test sample as well as the follow-up sample, and agreed to run them both again in sequence. As verbally reported to SCITEST, this second sample run again showed over an order of magnitude difference in uranium concentrations between the two samples.

The initial sample, which showed the elevated uranium concentration, was collected after 96 hours of pumping Well R at 74 gpm. The follow-up sample was collected after only one hour of pumping Well R at 10 to 12 gpm. As a result, we surmised that the duration of pumping might have led to the disparate results. A decision was made to conduct a second 96-hour pumping test on Well R, and collect samples at various time intervals to assess potential time-related changes in uranium concentrations. This test started on November 1 (2004) at a rate of 70 to 80 gpm, with samples collected after 10 minutes and 22 hours of pumping. After this time period, the generator/pump failed, so another test was re-started on November 8, 2004. Samples were then collected after 78 and also 96 hours of pumping. These four interval samples were submitted to the Vermont Health Department Laboratory for analysis of Kit ID analytes, (nitrate, chloride, odor, arsenic, iron, manganese, sodium, and uranium), gross alpha, and radon. In addition, sample splits from the 96-hour sample were submitted to KNL Laboratory Services for radionuclide testing to permit comparison between these two laboratories. For uranium analyses, KNL uses a radioactive particle counting procedure, while the VT Health Department Laboratory uses an ICP-MS analytical method that was approved in August of 2004. As with the initial follow-up sampling round, uranium concentrations during the second 96-hour pumping test were well below the drinking standard, and more than an order of magnitude lower than the initial concentration of 76 ppb. The results for the second 96-hour pumping test sampling episodes are included on Table 8, and are illustrated graphically on Figure 7 as a line chart, and on Figures 8 and 9 as a time-series plots.

A final sample was collected from Well R on February 1, 2005, after pumping the well for one hour at a rate of 75 gpm. This sample was analyzed by the VT Health Department Laboratory for Kit ID analytes, gross alpha, and radon. The results are similar to those obtained from the second 96-hour test, with uranium at a concentration below the drinking water standard.

One parameter that was below the drinking water standard during the initial test, but exceeded the standard in the follow-up sampling rounds was "odor". Testing results for the "odor" standard ranged

Ken Yelsey
August 25, 2005
Page 4

from 1.0 to 8 threshold odor units, exceeding the secondary standard of 3 threshold odor units. The cause of the odor problem is hydrogen sulfide, a dissolved gas that is not a regulated drinking water parameter, but can be aesthetically displeasing at high concentration. During the various pumping tests, a "rotten-egg" odor was noticeable in the discharge water, indicative that hydrogen sulfide gas was degassing from the pumped water.

Arsenic was detected in the Well R samples at concentrations ranging from 5 to 6 ppb, which is slightly elevated but below the current MCL of 10.0 ppb for this parameter.

In summary, the numerous re-sampling efforts of Well R have not been able to verify the existence of elevated uranium concentrations. Uranium was found at concentrations below the drinking water standard during all follow-up sampling events. Manganese was observed at a consistent concentration throughout all of the sampling events, exceeding the 0.05 mg/L standard. Arsenic was found at detectable concentrations, but below the drinking water standard. The "odor" standard was exceeded in several of the follow-up samples, due to the presence of hydrogen sulfide. Since the eventual use of Well R will include some type of treatment for manganese removal, it is likely that both the sulfide and the arsenic concentrations will also be reduced.

SOURCE PROTECTION AREA

Source protection areas for Well R have been delineated on the basis of an approved yield of 74 gpm and the hydrogeologic setting.

By default, Zone 1 for Well R is the 200-foot isolation zone around the well. Zone 2 is defined as the contributions outside of Zone 1 from the monitoring radius established in Subpart 3.3.5.2 (c), which is 2500 feet for Well R. Zone 3 is defined as the remaining watershed area above Zone 2, but may be reduced on a case-by-case basis giving consideration to the size of the watershed and the likelihood of contamination of the source.

Delineating recharge areas for wells completed in fracture-bedrock aquifers such as the one tapped by Well R is difficult, particularly in the absence of detailed information on the aquifer (fracture network, piezometric surface configuration, etc.).

As a starting point, the uniform flow equations can be used to define a capture zone to a well under sloping water table conditions. For Well R, we have estimates of the aquifer transmissivity ranging from 1,500 to 3,000 gpd/ft. The slope of the piezometric surface probably mimics the surface topography, which ranges considerably in the vicinity of Well R. Table 9 presents uniform flow equation calculations, using a range of slope values (0.025 to 0.10), the transmissivity range, and an average day pumping rate of 37 gpm (to simulate 12 hours of pumping Well R at 74 gpm). These calculations define a capture zone with a downgradient null point of 113 feet and lateral extents of 355 feet on both sides of the well perpendicular to the hydraulic gradient. The capture zone described by these calculations may be appropriate for a porous aquifer (i.e., sand and gravel), but may not very accurate for a fractured-bedrock aquifer, particularly the downgradient null point distance of 113 feet.

As a starting point, Zone 2 can be delineated using the 355-foot lateral boundaries as the radius of circle around Well R. The boundaries can then be extended, based on the surface topography, upslope to the 2500-foot monitoring radius. As illustrated on Figure 10, this configuration results in a land area of 240 acres. If this drainage area is extended to a distance of 5000 feet, the total drainage area to the well is

Ken Yelsey
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750 acres. The area between the 2500 and 5000-foot boundaries could be considered ZONE 3, rather than incorporating the entire upgradient watershed of Black Falls brook.

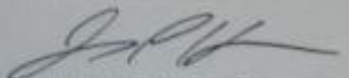
Potential recharge rates can be used to assess the size of the proposed source protection area. Table 10 provides calculations of recharge rates using infiltration rates of 4.5 and 9 inches/year. At these recharge rates, the minimum land area required to balance the 53,280 gpd volume is 80 acres for an infiltration rate of 9 inches/year, and 160 acres for 4.5 inches/year. These calculations assume that all infiltration will be available and/or captured by the well, which may be an invalid assumption given the complexity of fracture-bedrock aquifers and the hydrogeologic setting of Well R. Nonetheless, these calculations provide for a simple means to assess the appropriate size of the recharge area.

Table 10 also calculates the infiltration rate needed to balance the 53,280 gpd withdrawal using the 240 acre land area (Zone 2 on Figure 10) and the 750 acre land area (entire area plus Zone 3 on Figure 10). These calculated infiltration rates are 1.0 inches/year for the 750-acre area, and 3.0 inches/year for the 240-acre area. Given that 9 inches/year is a generally accepted infiltration rate for till soils in Vermont, the 1.0 inches/year rate for the 750-acre area may be considered too low, thus the 750 acre area is perhaps excessive.

Based on these calculations, we recommend using the 240-acre area as the entire source protection area for Well R. As shown on Figures 11 and 12, this area can be configured as one Zone 2 area, or assigning the upgradient area beyond the 710-foot circular radius as Zone 3. Any input from the Water Supply Division on these possible source protection area delineations would be appreciated.

If you have any questions concerning this information, please feel free to e-mail (geohoff@AOL.com) or call me (802-626-3077) at your earliest convenience.

Sincerely,
HOFFER CONSULTING INC.



Jefferson P. Hoffer, P.G.
President/Senior Hydrogeologist

enc.

cc: Tosca Smith, Montgomery Water System, PO Box 546, Montgomery VT 05471
Ken Trask, PE, Leach Engineering Consultants, PA, 36 Eastern Ave, Suite 6, St. Johnsbury, VT 05819

Appendix F. Preparing a Source Protection Plan Update

Guidance documents and checklists are available on the DEC website:

<https://dec.vermont.gov/water/drinking-water/public-drinking-water-systems/source-water-protection>

Appendix G: Permit To Operate

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

One National Life Drive - Main 2
Montpelier, VT 05620-3521

[phone] 802-828-1535
[fax] 802-828-1541

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

Agency of Natural Resources

July 12, 2016

Montgomery Water System
Attn: Scott Perry
P.O. Box 356
Montgomery Ctr., VT 05471

Re: Permit to Operate for Review and Return Montgomery Water System, WSID #5125

Dear Mr. Perry:

Enclosed you will find the new Permit to Operate (PTO) for the Montgomery Water System (Water System). Please notice that the PTO does not have an expiration date, although the PTO will be amended by this division as deemed necessary over time. There are general requirements specified in the PTO that the Water System is to adhere to.

If you have any questions regarding the information or requirements presented in this document, feel free to contact me at heather.collins@vermont.gov, or by phone at 802-461-3722.

Sincerely,



Heather Collins
System Operations Specialist
Drinking Water and Groundwater Protection Division

Enc: Permit to Operate

C:

WSID File #5125
Mark Brouillette, Designated Water System Operator, WSID # 5125
Nate Fredericks, Simon Operation Services
Ellen Parr Doering, Deputy Division Director, DWGWP
Tim Raymond, Operations and Engineering Section Chief, DWGWP
Patrick Smart, Operations Section Supervisor, DWGWP
Ben Montross, Compliance and Support Services Section Chief, DWGWP
Rodney Pingree, Water Resources Section Chief, DWGWP
Julie Hackbarth, Compliance and Certification Manager, DWGWP
Jessanne Wyman, Essex Regional Office Engineer, DWGWP
Jeff McMahon, Essex Regional Office Permit Specialist, EAO

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

One National Life Drive - Main 2 [phone] 802-828-1535
Montpelier, VT 05620-3521 [fax] 802-828-1541
<http://dec.vermont.gov/water>

*Agency of Natural Resources***Agency of Natural Resources
Vermont Department of Environmental Conservation
Drinking Water and Groundwater Protection Division****Public Community Water System Permit to Operate**

PERMIT NUMBER: WSID#-5125-16.0

WATER SYSTEM IDENTIFICATION NUMBER: VT0005125

PIN #: EJ96-0544

PERMITTEE (Owner): Montgomery Town

WATER SYSTEM: Montgomery Water System

TOWN: Montgomery

DESIGNATED CONTACT PERSON: Scott Perry

ADDRESS: PO Box 356
Montgomery Ctr., VT 05471

I. Authority

This Permit to Operate (Permit) a Public Community Water System, known as the Montgomery Water System (Water System) is issued to Montgomery Town (Permittee) by the Vermont Department of Environmental Conservation, Drinking Water and Ground Water Protection Division (the Division) on behalf of the Secretary of the Agency of Natural Resources (the Secretary) in accordance with 10 V.S.A. Chapter 56 and the Vermont Water Supply Rule (Rule). Because Vermont has primacy to implement the relevant provisions of the Federal Safe Drinking Water Act, and the Rule adopted under that Act, regarding public water systems and because the Rule incorporates the relevant Federal requirements, this Permit is also issued under and implements the provisions of Federal Law.

II. Findings

The Secretary finds that the Water System is in compliance with the Rule and therefore does not constitute a public health hazard or a significant public health risk.

III. Water System Description

This Permit authorizes the use of the following components of the Water System, the permitted water system demand, and the other specified aspects of the design and operation of the Water System described below:

A. Source: The Water System has been determined to be a groundwater system, subject to the Rule and the Federal Groundwater Rule, 40 CFR 141.400-141.405. The following source is connected to and supplies water to the Water System:

To preserve, enhance, restore, and conserve Vermont's natural resources, and protect human health, for the benefit of this and future generations.

Source #	Source Name	Source Type	Source Yield (gpm)	Authorized MDD Rate (gpd)
WL001	Well R	Bedrock Well	74 (permitted)	106,560

B. Permitted Water System Demand: The Water System serves a year-round residential population of approximately 500 through 190 service connections. The Maximum Daily Demand (MDD) Rate of the Water System is permitted for 106,560 gallons per day. This authorized rate equates to a maximum day water demand flow rate of 74 gallons per minute when the source is being operated for 24 hours. Source yield and design limitations (ex: treatment capacity, pump size, storage volume, etcetera) of the Water System have been compared against the MDD of the Water System to determine the adequacy of the source(s) to meet the expected demand.

C. Source Isolation Zone: The Permittee is required to control a 200-foot radius (Zone 1) around the permitted water source. Control is currently established by deed recorded in Book 56, Page 219 (Parcel ID 00001.016X, granted from the estate of Gordon Jewett) of the land records for the Town of Montgomery. All identified land use activities within the source's recharge area are subject to a routine vulnerability assessment and are managed by the Water System through a Source Protection Plan Update that is subject to review and approval of the Secretary once every three years.

D. Treatment Components, Processes, and Capacity: The Water System provides treatment to remove manganese via oxidation and a proprietary catalytic media filter, and has the capability to apply continuous disinfection using a hypochlorite solution. Water pumped from the well flows to a static in-line mixer where hypochlorite solution is added as an oxidant. Oxidized water flows from the in-line mixer through two proprietary catalytic adsorptive media filters installed in parallel, which remove manganese from the oxidized water. These filters are automatically backwashed based on either filter run times or pressure differentials as specified by the Operator. The backwash water flows to a reclaim tank where the solids present in the backwash are allowed to settle for two hours. The settled backwash water is then decanted and recycled to the raw water main at a location upstream of the filter and a recycle flow rate of approximately 10 gpm. Sludge accumulates in the reclaim tank and a manual sludge press is available to press the sludge to approximately 40% solids by weight. Filtrate from this filter press flows back to the reclaim tank, and is eventually recycled to the system's raw water pipe. The Water System has the capability of boosting disinfection by the addition of sodium hypochlorite at the "School Treatment Facility" (TP003) as necessary to maintain a measurable disinfectant level to the ends of the distribution system. Disinfection contact time is provided via a 430-foot long, 12-inch diameter pipe.

E. Storage Components and Capacity: The Water System is served by three storage facilities that all ‘float’ on the distribution system. The Fuller Bridge Storage Tank (ST003) is a two celled 150,000-gallon concrete storage tank that regulates Pressure Zone 1 of the distribution system. The Route 242 (ST001) storage facility is a two celled 250,000-gallon concrete storage tank that regulates Pressure Zone 2 of the distribution piping. The Regan Road Storage Tank (ST002) is a single cell 5,000-gallon concrete storage tank that regulates the static pressure for Pressure Zone 3 of the distribution system.

F. Pump Stations: The Water System is served by two booster pump stations that provide water to pressure zones 2 and 3 in the distribution system. The VT 118 pump station delivers water from Pressure Zone 1 of the distribution system through Pressure Zone 2 and into the VT 242 Storage Tank. This pump station consists of two centrifugal pumps rated for a total capacity of 50 gpm. The VT 58 Pump Station consists of a submersible pump installed in Pressure Zone 2 of the distribution piping using a standpipe and a pitless adaptor rated for a total capacity of 7 gpm. This pump station delivers water through pressure zone 3 of the distribution piping and into the Regan Road Storage Tank.

G. Distribution System: The distribution system consists of 2-inch diameter copper and 4-inch and 8-inch diameter cement lined ductile iron piping. The distribution piping includes three pressure zones:

- **Pressure Zone 1** is regulated by the water elevation in the Fuller Bridge Storage Tank, which receives water pumped from the system’s well. This pressure zone provides water to approximately 43 service connections located in of the Village of Montgomery and along the transmission main to the Rte. 118 pump facility (PF001).
- **Pressure Zone 2** is regulated by the water elevation in the Rte. 242 Storage Tank, which receives water from the VT. 118 Pump Station (this pump station draws water from the distribution piping in Pressure Zone 1). This pressure zone provides water to approximately 142 service connections located in Montgomery Center.
- **Pressure Zone 3** is regulated by the water elevation in the Regan Road Storage Tank, which receives water from the VT 58 pump station. This pressure zone provides water to 5 service connections.

H. Fire Protection: The Water System was designed to provide fire flow protection and has approximately 45 hydrants on 8-inch distribution lines.

IV. Special Conditions, Requirements, and Restrictions

A. Reserve Capacity Demonstration: The Water System has sufficient permitted source, treatment, and distribution system capacities to provide for further expansion of the Water System. The Permittee is responsible for monitoring the system’s water use. The Permittee shall ensure that water use allocations provided to new users, new consecutive systems, or as increased water use allocations to existing users do not exceed the Water System’s permitted maximum daily demand flow rate identified in Section III.B of this Permit. The Permittee shall notify the Division immediately when the Water System’s water use data exceed 90% of the permitted maximum day demand. Proposed improvements to the Water System are to adhere to the Vermont Water Supply Rule, Chapter 21, and the Vermont Wastewater System and Potable Water Supply Rule, Chapter 1.

V. General Conditions, Requirements, and Restrictions

A. Water Quality Monitoring.

1. Water Quality Monitoring Requirements: The Permittee shall comply with all of the Drinking Water Quality Monitoring Requirements set forth in the Rule at the frequency described in the Rule. The Permittee shall monitor for contaminants not listed in the Rule if the Secretary determines that the additional monitoring is necessary to protect human health and notifies the Water System of those additional monitoring requirements. The Secretary shall, on at least an annual basis, provide the Permittee with a monitoring schedule in order to assist the Permittee with its obligation to comply with the requirements of the Rule.

2. Notification of Water Quality Violations: The Permittee shall notify the Division immediately (and no later than 24 hours) following any test result greater than or equal to the Maximum Contaminant Levels (MCL), Maximum Residual Disinfectant Levels (MRDL), or turbidity levels as specified under 40 CFR, Part 141 (National Primary Drinking Water Regulations).

3. Reporting of Water Quality Analytical Testing Results: The Permittee shall be responsible for the submission of all water quality monitoring analytical testing results in accordance with the reporting timeframes in the Rule.

B. Reporting Requirements.

1. The Permittee shall submit a signed report to the Division once a month, no later than ten (10) days following the end of the month, with the following information:

a) A summary of the Public Water System operation, including the amount of water produced daily for each source. Water production summaries shall contain metered data.

b) Daily disinfectant residual entering the distribution.

2. The Permittee must report disinfectant residual in the water system at a location and frequency corresponding to the approved bacteriological sampling plan, and verify the free chlorine concentrations (if no free chlorine is available, the Permittee must measure total chlorine concentration as well) on the laboratory reporting form.

C. Requirement for Certified Operator: The Water System is a Class 3 Water System as defined in the Rule. Permittee shall assure that the appropriate class of Vermont certified operator is placed in responsible charge of the Water System in accordance with Section 12.2.2 of the Rule. This designation shall be made in writing, signed by both the owner and the certified operator, and available to the Secretary upon request. The certified operator shall hold a valid certification equal to or greater than the classification of the Water System. For Water Systems which only have one certified operator, the Permittee must notify the Division with 24 hours of changing their certified operator.

D. Notification of Change in Designated Contact: The Permittee shall notify the Secretary within 30 days of a change in the Designated Contact Person identified in this Permit. This notification shall include the new name, address, and telephone number of the individual who is authorized by the Permittee to act as the primary contact person for all matters related to the operation of the Water System.

E. Consumer Confidence Reports: The Permittee shall prepare and deliver to the customers of the Water System and the Secretary an annual consumer confidence report (CCR) on or before July 1 of each year. The Permittee shall comply with the requirements of 40 CFR Subpart O, including Appendix A, and Subchapter 10 of the Rule as it relates to the preparation, content, and distribution of the CCR.

F. Operation and Maintenance Manual: The Permittee shall operate the Water System in a manner consistent with the Water System's Operation & Maintenance (O&M) Manual, approved by the Secretary June, 2010. The O&M Manual shall be amended as needed when significant changes are made to the infrastructure and operations of the Water System. All amendments to the O&M Manual shall comply with the Rule and be approved by the Secretary. The O&M Manual shall be kept in a location so that it is readily available to the Permittee and the operator(s) of the Water System. If the O&M Manual cannot be located during an inspection or sanitary survey by the Secretary, the Permittee shall prepare a new O&M Manual and submit an electronic copy to the Division for approval.

G. Water System Modification Prohibited Without Required Permits: The Permittee shall obtain all required Source and/or Construction Permits before proceeding with modifications to the Water System, including, but not limited to, Water System expansions that require a Public Water Supply Permit, source deepening, reconstruction, and new treatment systems.

H. Use of Unpermitted Sources of Water: The Water System shall not use or connect to an unpermitted water source, including designated emergency sources, or hauled or bulk water, unless an emergency exists, (e.g. malfunctioning equipment, punctured storage tanks, unacceptable levels of contaminants with acute effects, acts of god that affect the functionality of the Water System, etc.) The unpermitted source shall be used for no more than 90 cumulative days unless the Permittee has submitted a written request to the Secretary for an extension and the Secretary has determined that there is good cause for granting an extension. When an unpermitted source is used in an emergency situation, the Permittee shall:

1. Notify the Division as soon as possible, but no later than within 12 hours of the connection and/or use; and
2. Issue either a Boil Water or a Do Not Drink notification to all users of the Water System within 12 hours of the connection and/or use.

I. Maintenance and Periodic Update of Approved Plans: The Permittee shall comply with the plans approved by the Secretary for the Water System. In the event of significant structural or operational changes to the Water System, the applicable plans shall be revised and submitted to the Secretary for approval. In addition, the plans shall be updated when specified in the Rule. The approved plans for the Water System are:

1. Revised Total Coliform Sampling Plan, approved by the Division on May 24, 2016;
2. Lead and Copper Sampling Plan, approved by the Division on May 27, 2016;

3. Disinfection Byproducts (DBP) Compliance Monitoring Sampling Plan, Stage 2, Approved by the Division on August 29, 2013; and

4. Source Protection Plan, most recent update approved by the Division on May 29, 2014.

J. Posting of Permit: The Permittee shall post the current valid operating Permit in a conspicuous place at the public Water System headquarters or treatment plant.

K. Permit Modification: Based upon information received (e.g., findings of a facility inspection, or information submitted by the Permittee), the Secretary shall determine whether one or more of the following causes to modify a Permit exist. If cause exists, the Secretary may modify the Permit, and may request an updated application and/or administrative contacts information if necessary. When a Permit is modified, only the conditions subject to modification are reopened. Cause for modification includes, but is not limited to:

1. Material and substantial additions or alterations to the Water System, or the Water System's operations or any other change in conditions, that occurred after the issuance of the Permit that justify the application of conditions different or absent from this Permit;
2. The receipt of information that was not available when the Permit was issued which justifies the application of conditions different or absent from this Permit;
3. The statutes, standards or Rule, on which the Permit was based, were revised by adoption or judicial decision after the Permit was issued and those revisions justify the application of conditions different or absent from this Permit;
4. A determination by the Secretary that other good cause exists for amendment, based on the need to protect human health or the environment; or
5. Cause exists for revocation of the Permit, but the Secretary determines that modification of the Permit is appropriate.

L. Permit Suspension or Revocation: This Permit may be suspended or revoked in accordance with the Rule.

M. Transfer of ownership or Control

1. This Permit is not transferable or assignable without prior written approval of the Secretary. All operating fees must be paid in full prior to any transfer or assignment of the Permit. In the event of a proposed change in control or ownership of the Water System, the Permittee shall provide a copy of this Permit to the prospective owner and/or operator and shall send written notification of the proposed change in ownership or control to the Secretary. The Permittee shall also inform the prospective owner and/or operator of their responsibility to make an application for transfer of this Permit.
2. Any request for transfer of ownership and/or control must, at a minimum, include:
 - a. A properly completed application form provided by the Secretary including the Permit application fee and administrative contacts information;
 - b. A written statement from the prospective owner or operator certifying:

- i.** The conditions of the operation of the Water System will not be materially different under the new ownership or control;
 - ii.** The prospective owner or operator has read and is familiar with the terms of the Permit and agrees to comply with all terms and conditions of the Permit; and
 - iii.** The prospective owner or operator has the technical, managerial, and financial capability to operate and maintain the Water System and remain in compliance with the terms and conditions of the Permit.
- c.** The date of the sale or transfer; and
- d.** Any other additional information the Secretary may require in light of the current status of the facility operation, maintenance, and Permit compliance.

N. Right of Access to the Water System: By acceptance of this Permit, the Permittee agrees to allow any duly authorized representative of the Secretary, upon presentation of the appropriate credentials, to:

- 1.** Inspect or investigate any portion of the Permittee's property, fixtures, or other appurtenances belonging to or used by the Permittee for the operation and maintenance of the Water System;
- 2.** Sample, monitor, or test the Water System; or
- 3.** Gain access to and copy any records, reports or other documents related to the operation and maintenance of the Water System.

O. Fees: The Permittee shall pay the annual operating fees specified in 3 V.S.A. §2822.

P. Compliance with the Rule and Other Laws: Compliance with this Permit does not relieve the Permittee of the need to comply with all applicable provisions of the Rule and all other applicable requirements of Federal, State, and Local laws.

Q. Appeals: Pursuant to 10 V.S.A. Chapter 220, any appeal of this Permit must be filed with the clerk of the Environmental Court within 30 days of the date of this Permit in accordance with the Rule governing appeals to the Environmental Court.

R. Enforcement: Pursuant to 10 V.S.A. Chapters 56, 201 and 211, any violation of the terms and conditions of this permit, including any compliance schedule, is grounds for the initiation of an enforcement action by the State against the Permittee.

S. Effective Date: This Permit becomes effective on the date of signing.

This Operating Permit for the Operation of the Water System located in Vermont is effective on July 12, 2016.

Alyssa Schuren, Commissioner
Department of Environmental Conservation
Vermont Agency of Natural Resources

By Bryan J. Redmond
Bryan J. Redmond, Director
Drinking Water and Groundwater Protection Division

Montgomery Water System
Source Protection Plan



Vermont Department of Environmental Conservation
Drinking Water and Groundwater Protection Division
Old Pantry Building (phone) 802-241-3400
103 South Main Street (in-state) 800-823-6500
Waterbury, VT 05671-0403 (fax) 802-241-3284
www.vermontdrinkingwater.org

Agency of Natural Resources

January 10th 2012

Montgomery Center Water System
Attn. Mr. Scott Perry
PO Box 356
Montgomery Center VT 05471

Re: Permit to Operate for Montgomery Center Water System WSID# 5125 – Compliance and Update

Dear Mr. Perry:

Thank you for the information provided in our conversation of January 5th 2012 and your follow up email of January 6th 2012. Please except this letter as the Division response to the Water System compliance status. We have also taken the information you provided to update our database.

First you are correct that there are no sanitary survey deficiencies currently identified for the Water System, so Section IV – Special Condition, Item C, in the Permit to Operate is not applicable and the Water System is in compliance with that condition. You are correct that Section IV – Special Condition, Item D does not apply to your Water System and was a carryover from the permit template used. Our apologies, no action required by the Water System

The Division has updated our database to reflect that your water system is a Class 3 water system and not a Class 2. We have changed the number of connections to 189 on the water system.

If you have any questions, please contact me toll free at (800) 823-6500, or on my direct line at (802) 654-8957.

Sincerely,

A handwritten signature in blue ink, appearing to read "R G Farley".

Robert G Farley
Hydrogeologist/ Systems Specialist

cc: WSID #5125
Tim Raymond, Operations Section Manager, DWGPD
Mark Brouillette, Water System Operator

To preserve, enhance, restore, and conserve Vermont's natural resources, and protect human health, for the benefit of this and future generations.

Appendix H: Sanitary Inspection



Town Of Montgomery

P.O. Box 356
Montgomery Center, VT 05471
802-326-4719
<http://www.montgomeryvt.us>

September 19, 2013

Benjamin L, Montross
VT DEC
Drinking Water and Groundwater Protection Div.
One National Life Drive Main 2
Montpelier, VT 05620-3521

Ref 1: Our letter dated May 20, 2013, Subj: Sanitary Survey WSID #5125

Ref 2: Your email dated August 9, 2013, Subj: Request for 30 day extension.

Dear Mr. Montross,

1. This letter is in response to your inspection of May 2013 identifying one significant and four minor deficiencies. Our letter (Ref 1) indicated action required by Item 2 was taken and completed.

a. The following 3 items have also been completed:

Item 3: Storage Tank Access Hatch: The a new gasket was installed on September 9, 2013.

Item 4: Backflow Prevention Testing: All backflow devices were tested and passed on June 12th.

Item 5: Required Disinfection By-Product Testing: A Stage 2 DBP was submitted to the State and accepted by them on September 12, 2013. (atch)

Additionally the system operator has been directed to order a backup pump for the Route 58 pump station as recommended in your letter.

b. The following item is ongoing:

Item 1: Inadequate Cross Connection Controls: Testing indicated the two sites do require the air gap systems. Owners of the two residences have agreed to installation of the required air gap and coordination has been done with Don Haddox, Division Engineer. Our system operator has contracted with Rondeau Plumbing to install the required air gap architecture at the two locations. Rondeau Plumbing has installed the same air gap architectures in other systems and is experienced in the requirement but the system operator will be present to oversee each installation. This work was rescheduled from this week but should be done this month depending on homeowner and installer schedules. We will confirm the installations via email as soon as they are complete.

For the Selectboard and Water Commission:

Scott Perry
Chairman

Copy to: Simon Operation Systems Inc.

**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

June 3, 2024

Town of Montgomery
Attn: Charlie Hancock
P.O. Box 356
Montgomery, VT 05471

Sent Via Email and Certified Mail

Re: Sanitary Survey Letter, Montgomery Water System, Public Community Water System, Montgomery, VT, WSID #5125

Charlie Hancock,

A sanitary survey of the Montgomery Water System (Water System) was conducted on May 2, 2024. Michael Langham and Matthew Caldwell represented the Vermont Department of Environmental Conservation, Drinking Water and Groundwater Protection Division (Division); Mark Brouillette, the Designated Water System Operator, represented the Water System. The Division issued the Water System a Permit to Operate (PTO) on July 12, 2016. The PTO does not have an expiration date, although the PTO will be amended by the Division as deemed necessary over time.

During the sanitary survey and associated file review, the following **Permit Violation** was identified. You are hereby put on notice that the Secretary of the Agency of Natural Resources (Secretary) is alleging that the Montgomery Public Water System, WSID #VT0005125, is in violation of its Public Water System Operating Permit. The Secretary is alleging the following violation of the PTO:

1. **Inadequate Monthly Operating Reports (MORs):** Section V(B) of the PTO requires the Permittee to submit a signed report to the Division once a month, no later than ten (10) days following the end of the month, which includes the metered amount of water produced by the Water System, and the daily disinfection residual entering the distribution system for each day water is produced. As of the date of this letter, the Water System has not submitted a MOR to the Division since August of 2022.

On or before July 10, 2024, the Permittee shall resume submitting MORs with all required information to the Division no later than ten (10) days following the end of each month.

Please be aware that in response to the alleged violation, the Agency may issue a Civil Complaint pursuant of 10 V.S.A Section 8019 which would assess a penalty. The Agency may also issue an Administrative Order pursuant to 10 V.S.A, Section 8008 which would require full compliance with all applicable statutes, rules, and/or permits; assess penalties; and if necessary, require corrective/restorative action and any other measures deemed appropriate. Prompt correction of the alleged violation may lessen the possibility or severity of any enforcement action taken by the Agency.

During the sanitary survey and associated file review, the following minor deficiencies were identified and must be resolved.

2. **Backflow Prevention Device Testing (TP002 & TP003):** Per Subchapter 21-8, Section 8.1.1 of the Vermont Water Supply Rule (Rule), any physical connection with a non-potable source of water shall include an adequate backflow prevention device which meets the requirements of American Water Works Association Standards. The Water System includes two (2) testable backflow prevention devices, one (1) each located on the domestic feed line for the Main Treatment Plant (TP002) and the School Pump Station Treatment Plant (TP003). During the sanitary survey it could not be determined whether the backflow prevention device had been tested within the prior year. The Water System must have the backflow preventors tested by a certified tester to verify that the units are functioning as intended. The devices must be retested at a frequency that is consistent with the manufacturer's recommendation (typically a minimum of once per year). All servicing documentation must be retained in the Water System's Operation and Maintenance (O&M) Manual.

On or before August 1, 2024, the Water System shall have the testable backflow prevention devices located at TP002 and TP003 tested and submit documentation of the testing to the Division.

3. **No Source Water Sampling Tap:** Per Chapter 21, Appendix A, Part 2.11 of the Rule, sample taps shall be provided so that samples can be obtained from each source and from locations in each unit operation of treatment. The Water System does not include a sample tap to collect an untreated water sample from the well source.

On or before August 1, 2024, the Water System shall install a source sample tap and provide the Division with photographic documentation of the installation.

4. **Expired Testing Reagents (Manganese):** Per Chapter 21, Appendix A, Part 2.9.1 of the Rule, plants that treat for iron and/or manganese must have test equipment capable of accurately measuring manganese. During the sanitary survey it was observed that the testing reagents for the manganese test kit were expired.

On or before August 1, 2024, the Water System shall obtain new testing reagents for the manganese test kit and submit documentation of the new reagents to the Division.

5. **Expired Testing Reagents (Chlorine):** Per Chapter 21, Appendix A, Part 2.9.1 of the Rule, systems which chlorinate must have test equipment for determining free and total chlorine residual. During the sanitary survey it was observed that the testing reagents for the chlorine test kit were expired.

On or before August 1, 2024, the Water System shall obtain new testing reagents for chlorine test kit and submit documentation of the new reagents to the Division.

6. **Inadequate Booster Pump Facility (PF001):** Per Chapter 21, Appendix A, Part 6.0 of the Rule, pumping facilities must be designed to maintain the sanitary quality of the pumped water. During the sanitary survey it was observed that the cap for the standpipe for the Route 58/Mill Hill Pump Station (PF001) did not include any bolts installed, which allowed the cap to be pulled off without the use of tools.

On or before July 1, 2024, the Water System shall install all bolts on the pump station standpipe cap so that the cap is tight fitting and may not be removed without the use of tools and submit photographic documentation of the repair to the Division.

7. **Inadequate Storage Tank Vent (ST001):** Per Chapter 21, Appendix A, Part 7.0.10 of the Rule, finished water storage structures must be vented. Vents must exclude insects and dust. During the sanitary survey it was observed that mud wasps had entered the vents of the Route 242 Storage Tank (ST001) and were plugging the screening material of the vent.

On or before August 1, 2024, the Water System must remove the insects from inside the storage tank vents and install new 24 mesh non-corrodible screening material and submit photographic documentation of the repair to the Division.

8. **Inadequate Storage Tank Access (ST002):** Per Chapter 21, Appendix A, Part 7.0.9 of the Rule, finished water storage tanks must be fitted with a solid, watertight cover. During the sanitary survey it was observed that there was a gap between the metal access hatch lid and concrete riser for the Regan Road Storage Tank (ST002). This gap allows for a direct pathway into the storage tank for foreign material to enter.

On or before August 1, 2024, the Water System must re-establish the seal between the metal hatch lid and concrete riser on ST002 to remove the gap around the lid and submit photographic documentation of the repair to the Division.

9. **Inadequate Storage Tank Vent (ST003):** Per Chapter 21, Appendix A, Part 7.0.10 of the Rule, finished water storage structures must be vented. Vents must be protected with a 24 mesh non-corrodible screen. During the sanitary survey it was observed that the screen installed on the vents for the Fuller Bridge Storage Tank (ST003) had a larger mesh size than 24 mesh.

On or before August 1, 2024, the Water System must replace the screening material on both vents of ST003 with a 24 mesh non-corrodible screen material and submit photographic documentation of the installation to the Division.

10. **Inadequate Storage Tank Access (ST003):** Per Chapter 21, Appendix A, Part 7.0.9 of the Rule, finished water storage tanks must be fitted with a solid, watertight cover. During the sanitary survey it was observed that the hatch lid gasket for the Fuller Bridge Storage Tank (ST003) was degraded and did not allow for a watertight seal.

On or before August 1, 2024, the Water System shall replace the hatch lid gasket on the ST003 hatch lid in order to re-establish a watertight seal and submit photographic documentation of the repair to the Division.

The following is provided for the Water System's review and comment.

11. **Service Line Inventory:** The Water System is required to complete and submit to the Division a Service Line Inventory by **October 16, 2024.** Division records indicate that as of the date of this letter, the Service Line Inventory remains incomplete. If you have questions pertaining to the Service Line Inventory, please contact the Infrastructure Sustainability Section at ANR.SLI@vermont.gov.

The Division requests that the Water System provide a written response to the above items **on or before July 3, 2024.** 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 include a compliance schedule to resolve these deficiencies in an amended PTO.

I appreciate Mark taking the time to conduct the sanitary survey of the Montgomery Water System. I look forward to working with you in the future. If you have any questions or would like to discuss the survey, please

Charlie Hancock
Montgomery Water System #5125
June 3, 2024
Page 4

feel free to contact Matthew Caldwell by email at Matthew.Caldwell@vermont.gov, or by phone at 802-522-6409.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matthew Hunt", with a long horizontal flourish extending to the right.

Matthew Hunt
Community Operations Section Supervisor

[Vermont Water Supply Rule](#)

enc: July 12, 2016 PTO

cc: Mark Brouillette, Designated Operator, WSID 5125
Matthew Caldwell, Community System Operations Specialist, DWGPD
Michael Langham, Community System Operations Specialist, DWGPD
Bruce King, Infrastructure and Sustainability Section Supervisor, DWGPD
WSID File 5125

Appendix I: State SPP approval letter dated May 22, 2017

2005 Source Permit E-1769 / E-1133

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

One National Life Drive – Main 2 [phone] 802-828-1535
Montpelier, VT 05620-3521 [fax] 802-828-1541

www.drinkingwater.vt.gov

Agency of Natural Resources

May 22, 2017

Crystal Currier
SOS, Inc.
143 South Main Street
Waterbury, VT 05676

Re: Source Protection Plan Update
Montgomery Water System, WSID #5125

Dear Ms. Currier:

Thank you for submitting the Source Protection Plan Update (SPPU) for the Montgomery Water System. The update was approved and since updates are due every three years, we would like to notify you that the water system's next SPPU is due by **June 1, 2020**.

Having good forest cover in the Source Protection Area (SPA) is considered one of the best ways for maximizing or improving both the quantity and quality of groundwater and surface water. Maximizing tree coverage within the SPA increases groundwater infiltration, reduces erosion, and reduces the probability of contaminant releases into the Source Protection Area. Please consider encouraging forestry stewardship within your SPA as an excellent Best Management Practice for protecting your drinking water. The County Forester for your area can be found at http://www.vtfpr.org/resource/for_forres_countfor.cfm.

If you have any questions about this letter or would like to discuss additional ways to protect the water system's water sources, please contact me at 802-585-4907(direct line), or ken.yelsey@state.vt.us. You may also wish to visit our website www.vermontdrinkingwater.org.

Respectfully,



Kenneth Yelsey
Water Resources Section
Drinking Water & Groundwater Protection Division

c. WSID #5125
Mark Brouillette, Montgomery Water System
Rodney Pingree, DWGPD



State of Vermont

Department of Fish and Wildlife
Department of Forests, Parks and Recreation
Department of Environmental Conservation
State Geologist
RELAY SERVICE FOR THE HEARING IMPAIRED
1-800-253-0191 TDD>Voice
1-800-253-0195 Voice>TDD

AGENCY OF NATURAL RESOURCES
Department of Environmental Conservation
WATER SUPPLY DIVISION
103 South Main Street
Old Pantry Building
Waterbury, VT 05671-0403

TEL 802-241-3400
TOLL Free 800 823-6500
FAX 802-241-3284

October 10, 2005

Tosca Smith
Town of Montgomery
P.O. Box 546
Montgomery, Vermont 05471

Dear Tosca:

Here is the Source Permit for well R. Congratulations to you and all the town officials for all your efforts over these many years. It's been quite a ride since the center and the village became one water system.

It's been a pleasure working with you and if you have any questions or comments, please call me.

Sincerely,

Kenneth Yelsey
Hydrogeologist



State of Vermont

Department of Fish and Wildlife
Department of Forests, Parks and Recreation
Department of Environmental Conservation
State Geologist
RELAY SERVICE FOR THE HEARING IMPAIRED
1-800-253-0191 TDD>Voice
1-800-253-0195 Voice>TDD

AGENCY OF NATURAL RESOURCES
Department of Environmental Conservation
WATER SUPPLY DIVISION

103 South Main Street
Old Pantry Building
Waterbury, VT 05671-0403

TEL 802-241-3400
TOLL Free 800 823-6500
FAX 802-241-3284

October 10, 2005

SOURCE PERMIT

MONTGOMERY WATER SYSTEM

PROJECT #E-1133 WSID # ~~222~~ PIN #EJ96-0544

PERMITTEE: Town of Montgomery

CONTACT PERSON: Tosca Smith
ADDRESS: P.O. Box 546
 Montgomery, Vermont 05471

SYSTEM NAME: Montgomery Water System

TOWN LOCATION: Montgomery

Findings and Conditions

1. Source Names: Well R
2. WSD Source Numbers: WL003
3. This Source Permit does not grant permission to connect the source, referenced above, to the water system without first obtaining a Permit to Construct specifying such, nor does it grant permission to operate the water system without a valid Permit to Operate.
4. This Source Permit, with conditions, is granted based on a review which determined that the proposed works, if built and operated in accordance with the approved planning documents, will conform with adopted design standards and will not constitute a public health hazard or a public health risk.

5. Source Site: Approved
 - i. Ownership/Control has been established by Deeded Ownership
Condition: The Ownership/Control as approved shall be maintained for the duration of this Source's use as a Public water supply, or its intent for public water supply use through maintaining a valid Source Permit.
 - ii. Source site public notice was issued June 3, 2004.
 - iii. It has been found that existing or future land use practices are not likely to constitute a public health hazard to the water supply source. No agricultural lands were identified.
6. Source Water Quality Results: Approved
 - i. Inorganic Chemicals: SCI Test Laboratory, reference #0407-03044 and Groundwater Analytical, reference #0407-03044. Well R exceeded secondary standard for manganese.
Condition: Treatment is required for manganese.
 - ii. Volatile Organic Chemicals: Groundwater Analytical, reference #0407-3046
 - iii. Synthetic Organic Chemicals: Southern Analytical Laboratories, Inc., reference #0407-03043-001.
 - iv. Radionuclides: KNL Laboratory, reference #'s 0409-04040-001 and 0411-04841-001; Vt. Dept. of Health, reference #'s R05-450, R005-456, R05-488, R05-489, R05-693; note: repeat samples were taken to confirm results
 - v. Groundwater Under the Direct Influence of Surface Water determination: Approved. Source was exempt from MPA testing per determination dated October 12, 2005.
7. Source Water Quantity: Approved. Well R approved for 74 gpm.
8. Source Construction: Approved per as-built construction details in the Hydrogeologic Analysis Report and Well Completion Report.
9. Source Interference: Approved. No significant interference.
10. Source Protection Area (SPA) and Source Protection Plan (SPP): Approved.
 - i. SPA public notice was issued September 13, 2005.
 - ii. Approved SPA map: Attached.
 - iii. SPP approval was issued October 8, 2005.
11. The project shall be constructed, completed, maintained, and operated in accordance with the approved plans and specifications and in accordance with the conditions of this permit. No changes shall be made in the project without the written approval of the Department of Environmental Conservation.
12. By acceptance of this permit, the permittee agrees to allow representatives of the State of Vermont access to the project, at reasonable times, for the purpose of ascertaining compliance with Vermont environmental laws and this permit.
13. This Source Permit is valid for a period of two (2) years if the source is not connected to the public water system. If the source is not connected within this time period this permit may be amended at

the discretion of the Secretary to be valid for another two (2) years upon receiving written application within 6 months prior to this permit's expiration date. Once the source is connected to the water system it shall then remain a permitted component of the water system's infrastructure and shall be referenced in the subsequent Permit to Operate.

14. The conditions of this permit shall run with the land and be binding upon, and enforceable against, the permittee and all assigns and successors in interest. The permittee shall be responsible for recording this permit in the municipal land records within thirty (30) days of issuance of this permit, and prior to the conveyance of any land associated with this permit.

Agency of Natural Resources
Department of Environmental Conservation
Jeffrey Wennberg, Commissioner

By 
Jay L. Rutherford, Director
Water Supply Division

Dated at Waterbury, VT this 10th day of October, 2005

- c Jeff Hoffer, Hoffer Consulting
 Ken Trask, Leach Eng.
 Ken Yelsey, WSD
 Rodney Pingree, WSD
 Eric Blatt, WSD
 Jean Nicolai, WSD
 PID #E-1133
 WSID # ~~8772~~ 5185

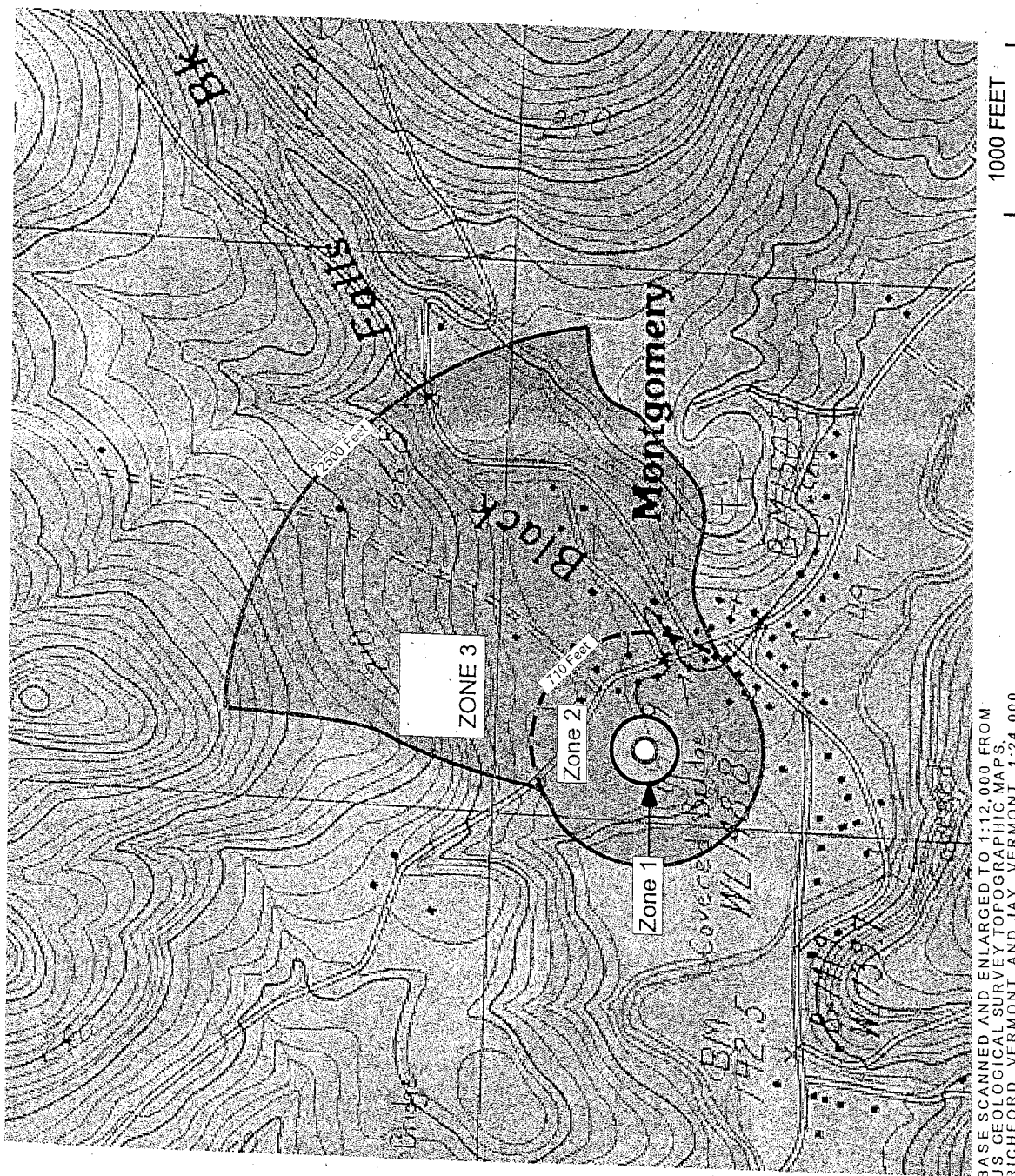


FIGURE 11
Source Protection Areas for Well R,
on 1:12,000 Topographic Map,
Montgomery Water System, Montgomery, Vermont

**Appendix J: DWGPD Review Summary and findings of 2021 draft SPPU and
6/5/26 Correspondence to Ross Dunham from L. Ranker of DWGPD.**

From: Ranker, Laura
Sent: Friday, June 5, 2026 10:22 AM
To: 'ross@simonop.com'
Subject: updates to 2021 SPPU WSID 5125 Montgomery Water System
Attachments: update tracker cover WSID 5125 6.5.26.pdf; WSID 5125 Draft SPP Revision 2.26.2021-LRreview.docx

Hi Ross,

Thank you for speaking with me yesterday on the status of the draft 2021 SPPU. As discussed, I have reviewed the 2021 submittal with the understanding of the need to make further updates based on the time that has transpired since the submittal and the recent correction made to the well location and resulting SPA adjustment made in the ANR NR Atlas. The attached draft 2021 SPPU document and summary page of my review provide recommended changes to the plan document for submittal of the 2026 SPPU. I will send a separate email with map documents created from the ANR NR Atlas mapping tool. At the time you sent me the update to the SPP on 2/26/21, you noted that you still needed to go through the landowner list and update that. I have not made any changes to the landowner list or parcel data and am leaving that for you to review and update as needed.

My edits and comments appear in red text and strikeout in the attached word document. If you agree, please change the red text to black and remove the text that has been marked with a strike out. Add your corrections to the narrative as applicable such as the contact information, etc. I have not made any changes to the PSOC other than the recognition of the floodplain restoration project currently proposed so you will want to make sure there are no changes to this section since the 2021 draft submittal. If changes are necessary, please update the PSOC Map (Figure 4). You will likely need to reformat after all changes are made so pages and text flow from page to page.

The most recent PTO and Sanitary Survey letter, and the 2005 Source Permit can be found on the Drinking Water Public Library <https://anrapp.vermont.gov/dwlibrary/>. I also have copies in pdf format that I can send you if you prefer.

My recommendation is to make the changes to the plan document and save it as a pdf for uploading to the ANR online portal. The updated SPA maps and other attachments (updates to the appendices) can be added to the online submission form when you go to submit the 2026 SPPU. The link to the ANR online portal Source Protection Plan Submission Form is here:

<https://anronline.vermont.gov/app/#/formVersion/ed1d3b8b-492e-4b5d-93c0-eeb6d48591e1>

Once I receive the submission with any attachments I will combine the files into one pdf document for the 2026 SPPU.

I am in the office all day today if you have any questions or need to reach me; 802-585-9478.

Thank you, Ross.

Sincerely,
Laura

Laura Ranker | Source Water Protection Specialist
Vermont Agency of Natural Resources | Department of Environmental Conservation
Drinking Water and Groundwater Protection Division | Public Drinking Water Program | Engineering & Water Resources
1 National Life Drive, Davis 4, Montpelier, VT 05620-3521
802-828-1535 (main office) | 802-585-9478 (cell-Direct Line) | 802-828-1541 (fax)
laura.ranker@vermont.gov
Connect with us on
<http://dec.vermont.gov/water>
<https://www.facebook.com/TheVermontDEC/>

The Agency of Natural Resources supports telework, and there are times when I may be working from another office location. I am available to connect by phone and email. I am also available to connect in-person upon request.

You may now submit permit applications and fee payments through our new online form to expedite its receipt and review:

https://anronline.vermont.gov/?formtag=DWGWPD_Intake

Division staff contact information can be found online here: <https://dec.vermont.gov/water/contacts>

Note: Written communications to and from state officials regarding state business are considered public records and, therefore, may be subject to public scrutiny.

UPDATE REVISIONS TRACKER

2021 Draft SPPU

WSID VT0005125**Montgomery Water System**

Reviewer	Date of Review	Comments, Changes, Revisions, Page #'s, Tables and Figures
L. Ranker, DWGPD	6/4/2026	2/26/21 SPPU submitted as a draft and part of DWGPD's backlog of plan files for review. Recommended edits and corrections made by the DWGPD to the 2021 draft SPPU: - Remove the draft watermark. - Added SPA Maps to bullet list of basic SPP components. (page 3) - Updates to text narrative regarding SS, PTO, corrections to well location and SPA. (pages 4-5) - Corrections to Table 1- update PTO, SS, and spelling for Mark Brouillette. (page 5) - Table 2 – added text to clarify inactive non-permitted status of WL001. (page 8) - Added note regarding the well correction in ANR NR Atlas and DEC well record database. (page 9) - Clarification to SPA description and zone area definitions. (page 9 and 10) - Description of Montgomery Floodplain Restoration project. (page 12) - Table 3. – update with access road (PSOC 3), flooding (PSOC5). (page 13) - Addition of Montgomery Floodplain Restoration Project strategies to reduce risk. (page 14) - Update contact information within the Contingency Plan as applicable. Review Town Contacts and update as needed. Note the updates that are made to the contact numbers for the DWGPD. (page 16) - Update Bottled Water Suppliers; some are out of business. (page 18) - Define VT WARN (spell out acronym. (page 19) - Added Corrected SPA MAPs with corrected well location and SPA boundary adjusted based on corrections to the ANR NR Atlas on 4/22/2026 by the DWGPD. (Figure 1, page 22) - Update Figure 5. Parcel Map which is based on 2009 data. (page 28) - Town of Montgomery link to Town Parcel Maps: https://mangomap.com/cartographic-technologies-inc/maps/133454/montgomery-vt-townview-online?preview=true# - Landowner Letter needs to remove reference to state agency being located in Waterbury. (page 29) - Appendix C. Addresses of Source Protection Area Landowners – Update this landowner listing as needed. Note any changes to parcel ID #s and landowner information. Address any changes due to SPA boundary adjustment as a result of correcting the well location. (pages 31-32) - Appendix D. Addresses of Public Officials – Update local contact information as applicable. Note, changes are made to the DEC information. (page 33) - Appendix F. Preparing a Source Protection Plan Update – this fact sheet is outdated and should be replaced or removed as some information is no longer correct. (pages 39-40) - Appendix G: Permit to Operate. Replace this with the most recent 2016 PTO. (pages 41-49) - Appendix H. Sanitary Inspection. Consider adding the 2024 SS Letter to this appendix. (pages 50-51). - Appendix I. State SPP approval letter of 2011. Consider if this is necessary to include. If so, the most recent letter should be provided. - Create an Appendix for a copy of the 2005 Source Permit for well R, WL003. Please forward a copy of the original source protection plan approved on 10/8/2005 to the Division for archiving in the Division's water system's record files. The Division does not have an electronic copy of this SPP.