

December 18, 2015

CERTIFIED MAIL

NOTICE OF ALLEGED VIOLATION

DEANE F HEDGES
CRYSTAL SPRINGS WATER SYSTEM
96 TERRACE ST
MONTPELIER VT 05602

Re: CRYSTAL SPRINGS WATER SYSTEM Public Drinking Water System VT0005264

Dear DEANE F HEDGES:

You are hereby put on notice that the Secretary of the Agency of Natural Resources (Agency), is alleging that the CRYSTAL SPRINGS WATER SYSTEM, Public Water System (Water System or Permittee) WSID #VT0005264 is in violation of its Public Water System Operating Permit (Permit).

The Permittee was issued the Permit on April 28, 2015; a copy is attached to this letter. The Permit contains a compliance schedule and Section II (C) required the Permittee to submit a completion report within 15 days of the compliance date(s) identified.

I. DESCRIPTION OF ALLEGED VIOLATIONS:

The Secretary is alleging the following violations of the Permit:

1. Section II(B)(1) of the Permit required the Permittee to provide detailed sketches or documentation identifying the construction of each in-home booster pump setup, establish and submit a protocol and procedure for annual inspections and maintaining the air gaps provided at each unit, and seek the approval of the Secretary for the in-home booster pumps serving the water system by July 30, 2015. As of the date of this letter the Permittee has not provided detailed sketches or documentation identifying the construction of each in-home booster pump setup, established and submitted a protocol and procedure for annual inspections and maintaining the air gaps provided at each unit, or sought the approval of the Secretary for the in-home booster pumps serving the water system.
2. Section II(B)(2) of the Permit required the Permittee to install level controls and a low water level alarm on the water storage tank serving the water system by July 30, 2015. As of the date of this letter the Permittee has not submitted documentation that it has installed level controls and a low water level alarm on the water storage tank serving the water system.
3. Section II(B)(3) of the Permit required the Permittee to install a new spring box cover on Spring 2 to be made from materials approved for drinking water construction and meeting the

requirements of the Rule by July 30, 2015. As of the date of this letter the Permittee has not submitted documentation that it has installed a new spring box cover on Spring 2 made from material approved for drinking water construction and meeting the requirements of the rule.

4. Section II(B)(4) of the Permit required the Permittee to install a new spring box cover on Spring 4 to be made from materials approved for drinking water construction and meeting the requirements of the Rule by July 30, 2015. As of the date of this letter the Permittee has not submitted documentation that it has installed a new spring box cover on Spring 4 made from material approved for drinking water construction and meeting the requirements of the rule.
5. Section II(B)(5) of the Permit required the Permittee to install a new storage tank access cover to be made from materials approved for drinking water construction and meeting the requirements of the Rule by July 30, 2015. As of the date of this letter the Permittee has not submitted documentation that it has installed a new storage tank access cover made from materials approved for drinking water construction and meeting the requirements of the Rule.
6. Section II(B)(6) of the Permit required the Permittee to repair the existing master meter or install a new meter capable of measuring the total volume of finished water produced for the water system by July 30, 2015. As of the date of this letter the Permittee has not submitted documentation that it has repaired the existing master meter or installed a new meter capable of measuring the total volume of finished water produced for the water system.
7. Section II(B)(7) of the Permit required the Permittee to submit an improvement plan and schedule for how it intends to provide adequate disinfection application and disinfection contact time for water produced by all sources by July 30, 2015. As of the date of this letter the Permittee has not submitted an improvement plan and schedule for how it intends to provide adequate disinfection application and disinfection contact time for water produced by all sources.
8. Section II(B)(8) of the Permit required the Permittee to permanently convert all fire hydrants connected to the system to flushing valves, paint the hydrants black, provide written notice to the local fire department that these hydrants are not to be connected to or pumped from in the event of a fire, and include updated information on the limitations of these hydrants in the system's Operation and Maintenance Manual by July 30, 2015. As of the date of this letter the Permittee has not submitted documentation that it has permanently converted all fire hydrants connected to the system to flushing valves, painted the hydrants black, provided written notice to the local fire department that these hydrants are not to be connected to or pumped from in the event of a fire, and included updated information on the limitations of these hydrants in the system's Operation and Maintenance Manual.
9. Section 1.1 of the Rule states that the Rule adopts and incorporates by reference 40 CFR 141 (as it existed on July 1, 2009). Section 40 CFR 141.404(a)(2) of the Groundwater Rule states that a groundwater system with a significant deficiency is in violation of the treatment technique requirement if after 120 days (or earlier if directed by the State) of receiving written notification of a significant deficiency, the system is not in compliance with a State-approved corrective action plan and schedule. The June 18, 2013 sanitary survey letter notified the Water System of existing significant deficiencies including items 1, 2, 3, 4 and 8 above. As of the date of this letter the Water System has not provided documentation that the significant deficiencies have been resolved and is not in compliance with the state-approved corrective action plan and schedule.

In response to the alleged violations, 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 violations may lessen the possibility or severity of any enforcement action taken by the Agency.

II. COMPLIANCE DIRECTIVES:

The Permittee shall submit the following:

1. On or before January 18, 2016, the Permittee shall submit detailed sketches or documentation identifying the construction of each in-home booster pump setup, establish and submit a protocol and procedure for annual inspections and maintaining the air gaps provided at each unit, and seek the approval of the Secretary for the in-home booster pumps serving the water system;
2. On or before January 18, 2016, the Permittee shall submit documentation that it has installed level controls and a low water level alarm on the water storage tank serving the water system;
3. On or before January 18, 2016, the Permittee shall submit documentation that it has installed a new spring box cover on Spring 2 made from material approved for drinking water construction and meeting the requirements of the rule;
4. On or before January 18, 2016, the Permittee shall submit documentation that it has installed a new spring box cover on Spring 4 made from material approved for drinking water construction and meeting the requirements of the rule;
5. On or before January 18, 2016, the Permittee shall submit documentation that it has installed a new storage tank access cover made from materials approved for drinking water construction and meeting the requirements of the Rule;
6. On or before January 18, 2016, the Permittee shall submit documentation that it has repaired the existing master meter or installed a new meter capable of measuring the total volume of finished water produced for the water system;
7. On or before January 18, 2016, the Permittee shall submit an improvement plan and schedule for how it intends to provide adequate disinfection application and disinfection contact time for water produced by all sources; and
8. On or before January 18, 2016, the Permittee shall submit documentation that it has permanently converted all fire hydrants connected to the system to flushing valves, painted the hydrants black, provided written notice to the local fire department that these hydrants are not to be connected to or pumped from in the event of a fire, and included updated information on the limitations of these hydrants in the system's Operation and Maintenance Manual.

Failure to submit the required documents by the dates identified above may result in the initiation of a formal enforcement action against the Permittee.

Please submit this requested information to the attention of Jeff Girard at the address listed in the letterhead. Should you have any questions or require assistance, please contact Jeff Girard at 802-585-0314 or jeff.girard@vermont.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ben Montross".

Ben Montross
Compliance and Support Services Section Chief
Drinking Water and Groundwater Protection Division

Enclosures: Permit to Operate

c: Ben Montross, Compliance and Support Services Section Chief DWGWP
Julie Hackbarth, Compliance and Certification Manager DWGWP
Tim Raymond, Engineering & Operations Section Chief DWGWP
Jeff Girard, Compliance Analyst DWGWP
Megan Young, Water System Specialist, DWGWP
Geoff Commons, Public Service Department (via email)
Bernie Chenette

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

DEANE F HEDGES
 VT0005264
 CRYSTAL SPRINGS WATER SYSTEM
 96 TERRACE ST
 MONTPELIER VT 05602

2. Article Number

(Transfer from service label)

7013 2250 0001 0761 5190

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Deane F Hedges

 Agent Addressee

B. Received by (Printed Name)

Deane Hedges

C. Date of Delivery

12-24-15

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below:

 No

Received
 DEC 28 2015

Drinking Water & Groundwater
 Protection Division

3. Service type

 Certified Mail® Priority Mail Express™ Registered Return Receipt for Merchandise Insured Mail Collect on Delivery

4. Restricted Delivery? (Extra Fee)

 Yes

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Drinking Water and Groundwater
Protection Division, EC13
One National Life Drive - Main 2
Montpelier, VT 05620-3521

