VERMONT

Vermont Department of Environmental Conservation *Agency of Natural Resources*
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.dec.vermont.gov/water

September 4, 2019

Carol Robertson
General Manager, Village of Hyde Park
Po Box 400
Hyde Park, VT 05655

Re: Permit to Operate for Hyde Park Water System, a Public Community Water System in Hyde Park, VT, WSID# VT0005154.

Dear Ms. Robertson,

Enclosed you will find an amended permit to operate for the Hyde Park Water System, a public community water system in Hyde Park, VT. Section II of this amended permit includes a compliance schedule requiring resolution of sanitary deficiencies that have been identified to exist for this Water System. Failure to correct these deficiencies in accordance with the schedule established in Section II.B of this permit would constitute a violation of the Permit, the Vermont Water Supply Rule, and the Federal Groundwater Rule (40 CFR Part 141 Subpart S). Please pay special attention to the Special Conditions established in Section IV of this Permit. These conditions: prohibit the Permittee from expanding use of the Water System, requires operation of the disinfection treatment facility, and requires the Permittee to provide plans for managing the water system's aging storage tank, transmission main, and spring box infrastructure.

Please notice that while this permit does not have an expiration date, this Division will amend the Permit as it deems necessary. The permit establishes general requirements that the water system is to adhere to.

Please contact me directly with any questions regarding this permit. I may be reached directly by phone at 802-461-5661 or by email at patrick.smart@vermont.gov.

Sincerely,

Pat Smart

Patrick Smart
Engineering Section Supervisor
Drinking Water and Groundwater Protection Division

C: Hyde Park Water System, Water System Owner/Permittee VT0005154
John D Strek, Designated Operator VT0005154
Ellen Parr Doering, Assistant Division Director, DWGWPD
Tim Raymond, Operations and Engineering Section Chief, DWGWPD
Rodney Pingree, Water Resources Section Chief, DWGWPD
Scott Stewart, Hydrogeologist, Water Resources Section, DWGWPD
Ben Montross, Compliance and Support Services Section Chief, DWGWPD
Patty D'Avignon, Carl Fuller, Dolores Eckert, Montpelier Regional Office, DWGWPD
Peter Kopsco, Permit Specialist, EAO
WSID File VT0005154

Enc: Permit to Operate

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Public Community Water System Permit to Operate

PERMIT NUMBER: 5154-19.0

WATER SYSTEM IDENTIFICATION NUMBER: VT0005154 PIN #: BR96-0188

PERMITTEE (Owner): Village of Hyde Park

WATER SYSTEM: Hyde Park Water System

TOWN: Hyde Park

DESIGNATED CONTACT PERSON: Karen Wescom

ADDRESS: Po Box 400
Hyde Park VT 05655

I. Authority

This Permit to Operate (Permit) a Public Community Water System, known as **Hyde Park Water System** (Water System) is issued **to the Village of Hyde Park,** (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, Violations, and Compliance Schedule

A. The Secretary finds that the Water System is being operated in a manner that constitutes a violation of the Rule. These violations are:

1. Inadequate Hydraulic Conditions, Main Distribution Pressure Zone: Per Appendix A, Part 8.1.1 of the Rule, **"***All water mains, including those not designed to provide fire protection, shall be sized after a hydraulic analysis based on flow demands and pressure requirements. The system shall be designed to maintain a minimum pressure of 20 psi at ground level at all points in the distribution system under all conditions of flow. The normal working pressure in the distribution system should be approximately 60 psi and not less than 35 psi."* The Preliminary Engineering Report prepared for the Water System dated December 27, 2018 (PER) included an analysis of

distribution hydraulic conditions that indicated the fire hydrants connected to the Water System's distribution pipe network will create unacceptable hydraulic pressures (pressures less than 20 psi) in the distribution system when the hydrants are flowed. These fire hydrants are not capable of providing the minimum fire flow required by Appendix A, Part 7.0.1 of the Rule.

2. Inadequate Hydraulic Pressures, Fitch Hill: Per Appendix A, Part 8.1.1 of the Rule, **"***All water mains, including those not designed to provide fire protection, shall be sized after a hydraulic analysis based on flow demands and pressure requirements. The system shall be designed to maintain a minimum pressure of 20 psi at ground level at all points in the distribution system under all conditions of flow. The normal working pressure in the distribution system should be approximately 60 psi and not less than 35 psi."* Nine Service Connections located on Fitch Hill receive water that does not meet the minimum hydraulic pressure requirements of the Rule. These connections are connected to the 6-inch diameter distribution main that runs from the Storage Tank to the distribution pipe network in the Village. Due to the elevations of these connections and the elevation of typical water levels in the storage tank, the hydraulic pressures experienced during typical conditions do not meet the requirements of Appendix A of the Rule.

3. Inadequate Hydraulic Pressures, Centerville Road Pressure Controlling Valve: Per Appendix A, Part 8.1.1 of the Rule, **"***All water mains, including those not designed to provide fire protection, shall be sized after a hydraulic analysis based on flow demands and pressure requirements. The system shall be designed to maintain a minimum pressure of 20 psi at ground level at all points in the distribution system under all conditions of flow. The normal working pressure in the distribution system should be approximately 60 psi and not less than 35 psi."* The Water System includes a manually operated pressure controlling valve installed on Centerville Road. This valve is relied upon to regulate the flow of water and stabilize the hydraulic pressures in the system's distribution main pressure zone in proximity to the Village. Currently, the valve is operated manually by the Water Systems operators adjusting the valve's position. The valve is unable to automatically adjust its operation in response to immediate and varying fluctuations in water flow throughout the Water System. The current valve configuration is inappropriate for the operating needs of the Water System and is believed to create unacceptable hydraulic pressure conditions in the system during periods of variable water user demands, including fire flow events.

4. Treatment Improvements are Required: Per Subchapter 21-7, Section 7.2.1 of the Rule, "*Disinfection facilities are required of all Public Community and Non-Transient Non-Community water systems. Public Community and Non-Transient Non-Community water systems shall have the capability of continuous disinfection.*" Water flows by gravity from the Spring through the treatment facility, and to and throughout the distribution system. During a disruption to the primary electrical supply for the treatment facility the electrically powered chemical metering pumps used to add disinfectant, sodium hydroxide, and phosphate solution would be inoperable and untreated water would flow from the Spring source to the distribution system.

5. Inadequate Hydraulic Pressures, Centerville Road and Transmission Main: Per Appendix A, Part 8.1.1 of the Rule, **"***All water mains, including those not designed to provide fire protection, shall be sized after a hydraulic analysis based on flow demands and pressure requirements. The system shall be designed to maintain a minimum pressure of 20 psi at ground level at all points in the distribution system under all conditions of flow. The normal working pressure in the distribution system should be*

approximately 60 psi and not less than 35 psi." The PER documents that the Water System currently provides water to two service connections, one located on Centerville Road, and one connected to the Cross-Country Transmission main, that do not meet the minimum hydraulic pressure requirements of the Rule. The PER documents that this deficiency is caused by the elevation of these service connections relative to the elevation of the Spring Box and Storage Tank.

B. The Secretary also finds that if the following compliance schedule is met, the continued operation of the Water System does not constitute a public health hazard or a significant public health risk:

1. To address Sections II.A.1, II.A.2, II.A.3, and II.A.4, of this Permit, the Permittee shall complete the following actions:

a) **On or before December 1, 2019,** the Permittee shall submit a Construction Permit Application to the Division that meets the requirements of the Rule, including the Technical Design Standards in Appendix A of the Rule. This Permit application must propose modifications to the Water System's approved infrastructure that are consistent with the selected alternative as identified in the Preliminary Engineering Report Dated prepared for the Water System and approved by the Division in a letter dated March 27, 2019.

b) **On or before December 1, 2020**, the Permittee shall complete infrastructure improvements as authorized by the Construction Permit obtained per Section II.B.1.a of this Permit.

c) **On or before February 1, 2020,** the Permittee shall submit all documentation as required by Construction Permit obtained per Section II.B.1.a of this Permit.

2. To address Section II.A.5 of this Permit, on or before November 1, 2019, the Permittee shall submit a plan and schedule to the Division that describes the Permittee's proposed approach to ensure the service connection connected to the Water System's cross-country main is either no longer being served by the Water System or provided drinking water from the Water System with operating hydraulic pressures that meet Appendix A requirements specified by the Rule. The Permittee shall implement this plan and scheduled as approved by the Division.

C. The Permittee shall submit a report to the Drinking Water and Groundwater Protection Division (Division) within fifteen (15) days after each required compliance date listed in Part B, above, indicating whether the required action(s) have been completed. If the required actions have not been completed by the specified date, the Permittee shall document the reasons for non-compliance in the report and shall make a written request that the Division modify the compliance schedule in this Permit. A compliance schedule will only be modified if there is good cause for the modification.

C. The Permittee shall give public notice to the users of the Water System of the requirements of the compliance schedule contained in this Permit on or before July 1 of each year that the items on the compliance schedule remain uncorrected. The Permittee shall also give notice to the users of the Water System whenever there is a change in the compliance schedule.

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:

Source #	Source Name	Source Type	Source Yield (gpm)	Authorized MDD Rate (gpd)
WL001	Spring	Groundwater	unknown	96,480

B. Permitted Water System Demand: System serves a year-round residential population of approximately 462 people through 276 service connections. The Water System is authorized for a Maximum Daily Demand (MDD) Rate 96,480 gallons per day, and an average daily demand (ADD) rate of 48, 240 gallons per day. This authorized rate equates to a flow rate of 67 gallons per minute when the source is being operated for 24 hours to meet MDD or operated for 12 hours to meet ADD. This authorized MDD Rate was determined based on the design capacity for the water system's treatment facility (TP001). The Division's records for the Water System do not include an approved yield for the spring source; however, historical operating data indicate the source has been able to consistently meet the demands of the system's users Source yield and design limitations (ex: treatment capacity, pump size, storage volume, etcetera) of the Water System have been compared against the authorized MDD above to determine the adequacy of the infrastructure to meet the expected demand.

C. Source Protection and Isolation: Source isolation zones are prescribed by Appendix A, Part 3.3 of the Rule. Current land uses within 200 feet of the Spring include a roadway. All identified land use activities within the sources' recharge areas 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.

C. Treatment Components, Processes, and Capacity: The Water System's treatment facility (TP001) includes addition of sodium hydroxide for corrosion control treatment, addition of a phosphate solution to sequester iron and manganese, and addition of hypochlorite solution for disinfection treatment. Disinfection contact time is provided by approximately 120 feet of 12-inch diameter pipe.

D. Storage Components and Capacity: The Water System includes one storage tank, a 270,00-gallon capacity concrete reservoir with a wooden truss roof. This storage tank is located on Fitch Hill.

E. Pump Stations: The Water System includes one booster pump station, the Fitch Hill Pump Station (PF001). This pump station consists of two 1 hp jet pumps, two WEllxtroll hydropneumatic tanks, and totalizing meter installed on the pressurized main served by the pump station. This facility provides water service to six service connections.

F. Distribution System: The Water System's distribution pipe network includes approximately 9.3 miles of cast iron, asbestos-cement, and ductile iron distribution mains ranging in size from 2-inches to 8-inches in diameter. The distribution system includes fire

hydrants (see Section G, below), and two 2-inch diameter flushing hydrants that have been installed on dead-end distribution mains.

G. Fire Protection: The Water System was designed to provide fire flow protection, and has approximately 23 fire hydrants installed throughout the distribution system. As documented in Section II.A.1 of this Permit, these hydrants do not meet the minimum flow and hydraulic pressure requirements established in the Rule. Section II.B.1 of this permit requires the Permittee to improve the hydraulic conditions of the distribution system. Section IV of this Permit requires the Permittee to provide written notification to the local fire department about the deficient hydrants.

IV. Special Conditions, Requirements, and Restrictions

A. Water System Expansion: The Water System does not have any reserve supply capacity. The Permittee shall not authorize additional connections or increases in allocations to existing Water System Service Connections without first receiving an amended Permit to Operate from the Secretary. The Division does not have any documentation establishing an approved yield for the Water System's approved Source (see Section III.B of this permit). The Permittee must demonstrate that the Water System has enough source, treatment, and storage capacity to support future growth in order for this condition to be revised in an amended permit

B. Continuous Disinfection Required: Until otherwise directed by the Secretary, the Permittee shall operate its chlorine disinfection system on a continuous basis. The Permittee must maintain measurable free chlorine residual concentrations throughout and to the ends of the distribution system.

C. Fire Department Notification Required: On or before October 1, 2019, the Permittee shall provide written notification to the local fire department identifying every fire hydrant connected to the Water System that cannot meet the minimum fire flow and hydraulic pressure requirements of the Rule. This notification shall document that the deficient fire hydrants have been converted to flushing hydrants and are not suitable for fire protection uses. This notification must be kept in the Water System's O&M Manual and shall be provided to the Secretary upon request.

D. Spring Box Maintenance is Required: The Water System's Spring Collection Box, constructed around 1915, is deteriorated and nearing the end of its service life. On or before February 1, 2020, the Permittee shall provide the Division a plan and schedule for repairing or replacing this spring collection box.

E. Storage Tank Maintenance or Replacement: The Water System's Storage Tank was constructed about 1942 and is nearing the end of its service life. On or before June 1, 2020, the Permittee shall provide the Division with a proposed plan and schedule for repairing or replacing this storage tank.

V. General Conditions, Requirements, and Restrictions

A. Water Quality Monitoring.

1. Water Quality Monitoring Requirements: The Permittee shall comply with all 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), or other water quality adopted by the Agency to protect public health..

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 from each source. Water production summaries shall contain metered data.

b. Daily disinfectant residual entering the distribution system for each day that disinfectant is introduced.

c. Daily phosphate concentration measured in water entering the distribution system for each day of water system operations.

d. Results of daily finished water pH analysis.

2. The Permittee must report disinfectant residual in the water system at a location and frequency corresponding to the approved total coliform 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. The Permittee shall ensure 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 within 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 on April 9, 2007. 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. Reporting of Non-Routine Operating Conditions: The Permittee shall report to the Division whenever atypical or non-routine operating conditions are experienced by the Water System, including but not limited to deviation from within normal operating distribution system pressure ranges, e.g., significant and unusual fluctuations in distribution system hydraulic pressure; hydraulic pressures of less than 35 psi in the distribution system; failure of critical Water System infrastructure components; water color or odor complaints/observations from system users; or any operating condition that does not meet the standards of Appendix A of the Rule and/or a condition that poses a significant health risk. When experiencing atypical or non-routine operating conditions, Permittee shall:

1. Notify the Division as soon as possible and within 12 hours of becoming aware of the Non-Routine Operating conditions.

2. Take appropriate action(s) to safeguard all users of the Water System, including notification to all users when the water supply becomes vulnerable to contamination (e.g., VT-Alert, Television, Radio, Hand delivery (door to door), other method as advised).

3. Follow all actions and provide all documentation as requested by the Division.

I. Use of Unpermitted Sources of Water: The Permittee shall not use or connect an unpermitted and/or unauthorized water source, including hauled bulk water and designated emergency sources, to the Water System unless an emergency operating condition exists. When experiencing operating conditions that may require the use of an unpermitted or unauthorized source, the Permittee shall:

1. Notify the Division prior to utilizing the unpermitted or unauthorized source of Water.

2. Provide all public notice as recommended by the Division, which may include: issuing a Boil Water, Do Not Drink, or Do Not Use Notification to all users of

the Water System. Notifications shall be provided within twelve hours of receiving the Division's recommendation or as otherwise directed by the Division in writing.

3. Follow all actions and provide all documentation as requested by the Division.

4. The unpermitted and/or unauthorized 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.

J. 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 Rule Coliform Sampling Plan, approved by the Division on October 22, 2015;

2. Lead and Copper Sampling Plan, approved by the Division on June 3, 2013;

3. Disinfection Byproducts (DBP) Compliance Monitoring Sampling Plan, Stage 2, approved by the Division on October 24, 2012; and

4. Source Protection Plan, last update approved by the Division on January 12, 2018.

K. 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.

L. 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.

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

N. 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.

O. 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.

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

Q. 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.

R. Appeals: This permit may be appealed to the Environmental Division of the Superior Court within 30 days of the date the final decision is posted to the Environmental Notice Bulletin in accordance with 10 V.S.A., Chapter 220.

S. 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.

T. 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 September 4, 2019.

Emily Boedecker, Commissioner
Department of Environmental Conservation
Vermont Agency of Natural Resources

By

Ellen E Parr Doering, Assistant Division Director
Drinking Water and Groundwater Protection Division

PS/TR