

---

# CFD2 | Special Meeting

05.31.2022 via Zoom 5:30-7:04pm

---

## Attendees

Jonathan Ashley (Dubois & King)  
Farley Brown  
Gina Campoli (President)  
Nicole Civita (Board Member)  
Heather Collins (DEC)  
June Cook

Paula Davidson (Treasurer)  
Christina Finkelstein (Secretary)  
George Hall (Board Member)  
Norm Hanson (Board Member)  
Renee Rossi (Board Member)  
John Zabar

## ABSENT:

Ian Baldwin (Board Member)  
Steve Smith (Systems Operator)

## Agenda

- Review the costs and other considerations regarding the state's interim blending requirements and decide whether or not to undertake them.
- New sources (Well 5 and 6) update
- Generator project update
- Next meeting dates agenda items

## Changes/Additions to the Agenda

None

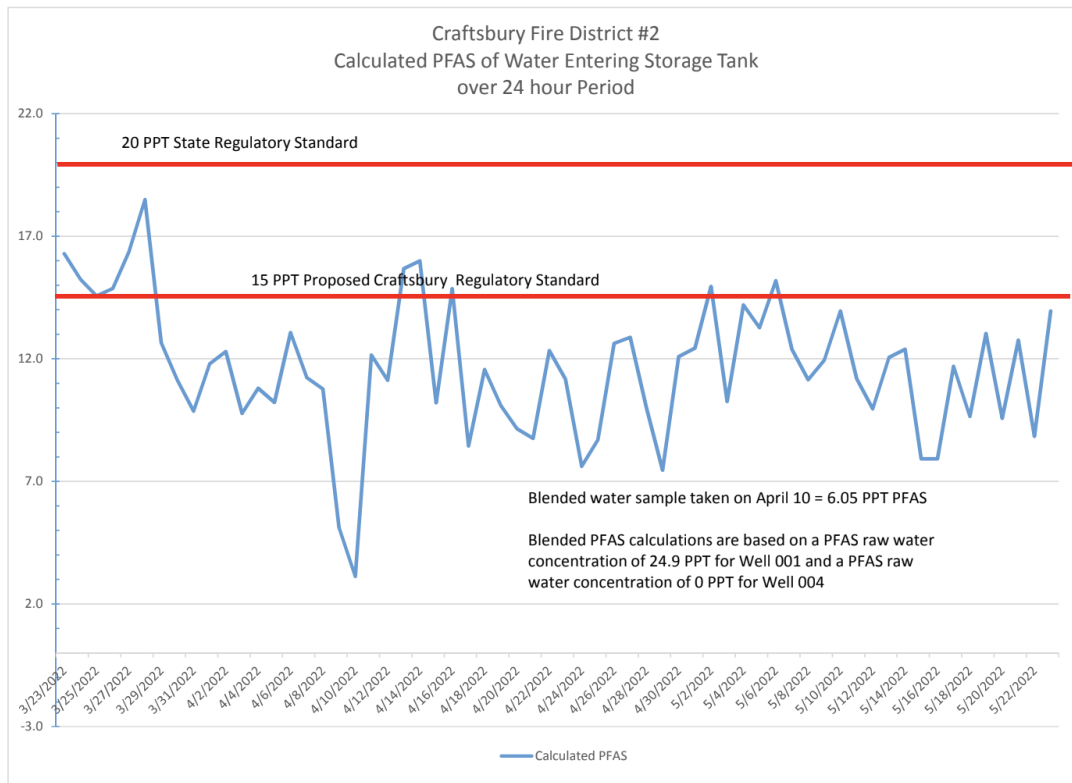
## Secretary's Notes: Corrections to 5.31.2022 Minutes

- John Kiernan of RCAP Solutions was inadvertently listed as a meeting attendee
  - The cost for regular PFAS testing is \$475, not \$75
-

## Costs and Other Considerations re State's Interim Blending Requirements

- The state's requirements to lift the Do Not Drink Order includes rushed PFAS testing results of the blended water and a raw sample from each well every two weeks ("**DEC's Testing Requirements**"). Jon Ashley reviewed rough cost estimates to implement DEC's Testing Requirements for the next six months. This includes:
  - Kupferle Eclipse #88 Sampling Station, designed for cold climates (\$4,550, installed)
  - Rush sampling costs - assume 26 samples @ \$750 each (\$19,500, includes shipping)
  - Allowance for engineering approval (\$2,000)
  - Labor (Project Engineer, Project Manager, Systems Operator (\$11,310)
  - **Total 6-month estimate: \$37,360** (this does include the hand or electric pump needed to drain the sampling station)
- As noted by Bryan Redmond at the Special Meeting on May 14, the sampling frequency can be reduced to monthly if the results are consistent and reliable
- Jon noted that getting rushed PFAS results within 5-7 days for a full six months is not guaranteed as there are a limited number of state-certified labs and large demand (some in similar emergency situation)
  - Q (Christina) re whether even 14 days (the state's maximum requirement) is feasible. Jon thought given supply, demand, and other conditions, there are no guarantees.
  - Q (Norm) re whether this testing is required for a minimum of six months. Gina said that the six months was based on a guestimate of how long it would take to get WL-05 in place. Nicole added that the six-month timeline is very aggressive and includes potential hard stops due to the ground freezing.
- Heather Collins asked Jon for clarification re need for the Eclipse sampling station rather than a self-draining yard hydrant, which is significantly less expensive. Jon noted that the hydrant would have a risk of cross-contamination with coliform under low pressure situations. Heather reported that the hydrants exist in other water systems and that Bryan Redmond conveyed to her that CFD2 was considering installation of such a hydrant. Jon shared he has been told by sanitary surveyors that the hydrants are discouraged. Heather said she would check with the DEC engineering section re whether there is an official ruling.

- 
- Nicole added that while she appreciates confirmation re whether the hydrants are allowed, the cost for the sampling station by itself will not be significant factor in the decision re whether to pursue DEC's Testing Requirements
  - Heather noted that there is also significant labor required to drain the pump each time and requires a power source to drain
  - Nicole reported on the follow-up conversation with the Agency of Agriculture since the Special Meeting
    - Issue: Are there any specific agricultural-related regulations that may affect the way Sterling College and others who garden for home, barter, or sale can operate while the municipal water system is simultaneously on a Do Not Drink Order and below the 20 ppt MCL
    - Response: Sarah Vose from the Department of Health met with colleagues at the Agency of Agriculture. The current regulations for irrigation of crops under the Food Safety Modernization Act only require biological testing. There are no requirements for PFAS or other chemical testing for water used to irrigate crops. Therefore the recommendation from the health department that water with PFAS above the MCL of 20 ppt not be used to water crops is the state's advice to the college.
    - Nicole added that the Agency of Agriculture confirmed that this is a recommendation as opposed to a regulatory requirement
  - After reviewing the latest graph of the calculated model of PFAS levels [see next page], Nicole added that Sterling's level of comfort increased because the water seems to be safer now than what it had access to in recent years. Nicole shared the graph on screen and noted that while the calculated PFAS bounces around, at no point has it exceeded 20 ppt and exceeded 15 ppt only a few times.
    - Jon noted that the graph shows the calculated PFAS level based on the flow from each well and the last known PFAS levels of each (WL-01 at 0 ppt and WL-04 at 24.9 ppt).



- The results from the PFAS sampling of the blended water [approved at the Special Meeting on May 16] was delivered to the testing facility on May 19, but CFD2 has not yet received the results.
- Christina added that regardless of the Board's decision on whether to pursue the state's blending requirements, CFD2 should consider doing an additional raw sample of WL-01 to confirm the reliability of the 24.9 ppt measured in the last test.
- Gina wondered how much additional testing should be done if CFD2 decides not to comply with DEC's Testing Requirements as any testing would be done independent of the state's requirements and CFD2 lacks any authority to interpret the results or make recommendations. She added that additional testing might however help gardeners feel more assured of the current PFAS levels.
- Nicole added that for Sterling a key piece of information is that there is no regulatory standard for agricultural water that puts Sterling out of compliance and while there is a strong recommendation not to use water above the MCL of 20 ppt, the graph suggests the water is well below the 20 ppt. So additional validation of the

data in the graph would support Sterling operating within the state's recommendation.

- Gina asked if Sterling would need more testing done to feel comfortable or will it assume that the current levels will be consistent. Nicole said it would depend on how close the PFAS level of the blended water sampled on May 18th comes to the previous result [sampled on April 10, 6.05 ppt]. Without the most recent result it is hard for Sterling to know how it wants to proceed, but the graph is very encouraging. It's also important to note that the PFAS uptake would be through crops rather than direct consumption via drinking.
- Norm added that getting and waiting for the additional test results is sound and rational. Gina noted that these test results are for Sterling and anyone else who wants additional information before they water their vegetables, but has no bearing on whether the Do Not Drink Order is lifted. Norm added that the test results will give many people some additional confidence. Everyone agreed, however, that no one should go against the state's recommendations and drink the water until the Order is lifted.

### **Next Steps/Discussion**

Gina asked if the Board was ready to make a decision regarding whether or not it wants to proceed with DEC's Testing Requirements to lift the Do Not Drink Order

- Norm asked what the cost would be for each approach for the next six months. Gina noted that there is no cost to not proceeding as long as DEC continues to pay for the bottled water. There are indirect costs such as potential reduction in home value, but no direct costs to CFD2 if it does not proceed. If CFD2 proceeds with DEC's Testing Requirements, then it will have to pay for the PFAS testing and the associated labor and material costs [outlined above and totalling \$37,360 for the next six months].
- Nicole noted that there are two key pieces of information she hoped to have to inform decision making: (1) results from the May 18 PFAS testing of the blended water and (2) limitations, if any, on how long DEC will pay for bottled water. Given Heather's comments it sounds like the fund is indeed limited but we don't know precisely how much of our projected use will be covered until we provide additional information.
- Nicole noted that the bottled water system is largely working and customers have adapted. Complying with DEC's Testing Requirements would require a lot of extra work without any extra certainty to get off and remain off the Do Not Drink Order

---

since if the system goes out of compliance even once, it will be back on a Do Not Drink Order until a new source is in place.

- Gina added that there is also a capacity issue. D&K, Steve, and the Board should be focused on either the new source well or complying with DEC's Testing Requirements as doing both will wear everyone down. Gina shared that the Board should keep its focus on getting a new source well in place and that given that Sterling might be able to water their crops with confidence, we should continue on the bottled water and not move forward with complying with DEC's Testing Requirements.
- Paula noted that complying with DEC's Testing Requirements would cost more than the system can recover in revenue during that time so it would lose money all for a temporary solution. Nicole added that all the cash outlays for the emergency projects are a challenge. Paula added that the line of credit covers the emergency costs but CFD2 is also paying interest.
- Renee emphasized that if CFD2 tests above 20 ppt again then any effort and expenses to date would be moot as it would need to go back on a Do Not Drink Order. It's important for customers to understand that there is potential for something like a water line break somewhere that causes usage [and therefore proportion of water from WL-01] to shoot up. We would quickly be out of compliance.
- Nicole asked for confirmation that DEC's Testing Requirements would remain on the table should circumstances change (e.g., the recent PFAS results come back higher than expected, bottled water reimbursement stops, or the model to compute the PFAS level is wrong). Heather confirmed.
- Discussion and agreement that the Board does not need to take any action at this time. Heather asked that Gina confirm to the DEC via email that CFD2 proposes to stay on the Do Not Drink Order and provide bottled water while it pursues the new source well but that if conditions change, CFD2 will reassess meeting DEC's Testing Requirements.
  - Heather noted that there is no longer a need to amend CFD2's operating permit

**MOTION: Nicole made a motion to stay the course for the time being based on the facts and information available to the Board and to authorize Gina to send an email to to DEC indicating CFD2's intention to remain on the Do Not Drink Order and to provide bottled water to its customers while it works to develop a new source well. George seconded the motion. The remaining Board members approved the motion. Motion passed.**

## New Source Well(s) Update

### WL-05 Update

- Gina noted that the Special Projects Subcommittee met with Jon Ashley last week to get a sense of best-case timeline assuming everything – engineering, permitting, materials, labor, weather – falls into place.
- Timeline (Jon):
  - (DONE) Administratively complete source permit application
  - DEC representatives are conducting a site visit on Friday [June 3] to examine physical setting of WL-05 and the surrounding area for potential sources of contamination
  - DEC reviews new source permit application
  - DEC determines whether CFD2 can drill a well in the designated location or whether it will need to be moved at all
  - Line up a driller [D&K have been working to get on a driller's schedule. No firm dates yet but have made contact]
  - Contractor drills the well
  - Once the well is in place, there is a 96 hour test to monitor demand and the pump at the design flow rate required for the system. During this test period, any other wells within 1000 feet will also need to be monitored.
  - D&K submits a report to DEC on estimated long-term yield based on the 96 hour test results
  - DEC reviews report and either sends back with comments or approves the long-term yield results
  - DEC issues a permit for the approved yield
  - Engineering services agreement needed with D&K to oversee construction bid process
  - Obtain Construction Permit to connect the source to the water system
  - Apply for Construction Loan
  - Contractor connects the source to the water system
- Some of the steps need to be done concurrently
- **Six months from now is the best-case scenario for having a new water source connected to the water system**
- Gina asked whether the piping material will be available. Jon said that there is a currently a 12-month wait for the type of pipe used to connect customers to the distribution system, but the wait time for the piping needed in this case is less. He added that these are the types of factors in the timeline that we can't control.

- 
- Gina confirmed that we need to get the pipes in before the ground freezes or CFD2 would need to wait until the spring.
  - Bottled Water. Gina noted that Special Projects Subcommittee wants to confirm its assumption that the state will continue to pay for bottled water for as long as necessary provided CFD2 is making a good-faith effort to move forward with a new source well. Heather said she had a conversation with Bryan Redmond earlier that day and he relayed that the fund from which the bottled water is being paid is capped and will eventually run out as it is being expended on a first-come, first-served basis. The fund is being replaced by federal funding, but the federal funding does not provide for bottled water or testing reimbursement.
    - DEC would like CFD2 to provide numbers re how much has been spent to date and projections for the summer and fall.
    - DEC will try to reimburse CFD2 for the bottled water out of the current fund for as long as it is able. Gina asked if that is for six months or a year. Heather said they would need to see the numbers on how much was spent and projected spending.
    - Discussion re how often CFD2 has been getting water deliveries and weekly cost. Use and need has varied based on whether Sterling was in session and more recently by the Craftsbury Academy, which is no longer hauling water from the lower school as that is not allowed. Paula to send specific numbers after the meeting.
  - Heather said she had a stepwise list that Scott Stewart of DEC shared re timeline and steps involved in the source permitting. Gina said it would be good to get DEC's perspective to supplement what we know from D&K since in addition to permitting there is engineering, notice to landowners, material availability, etc. that all affect the timeline.
  - DEC Timeline (Scott Stewart via Heather):
    - After site visit on Friday [June 3], Scott can issue an approval to drill on Monday [June 6] if the area looks good
    - D&K would need to secure a driller
    - D&K needs to send in a source testing application
    - D&K needs to communicate to driller need for well log ASAP. DEC normally has 60 days to review the well log, but Scott said he would review within one day of receipt
    - Conduct step test and constant discharge. This would take approximately a week to complete.
    - D&K submit source evaluation report, which would include water quality testing. Results could take a month or longer to get back so Scott said there can be some flexibility if DEC has the results for all the acute contaminants,



in which case they can issue an emergency connection permit that is valid for 90 days without having a construction permit in place and would even allow temporary piping. There would be a 90 day window to get everything connected and the rest of the non acute contaminants testing completed.

- The temporary line would allow the system to get off the blending
  - Concurrently, D&K can complete the rest of the permitting for the source permit and for the construction permit for the final connection to the water system.
  - In short, Scott is making CFD2's connection a priority but there are many variables in play.
- Gina asked about a wetlands permit and an archeology permit. Heather said she did not know about those as they are outside their purview.
  - Heather noted that while DEC can allow the emergency connection, the source permit will require a public notice period per the Environmental Notice Bulletin of 2019. The permit will need to be posted for 30 days for public comment. The construction permit application requires 14 days for public comment.
  - Gina asked what the best-case scenario looked like. Heather said CFD2 could have a source permit in September, but that would depend on driller availability and the how quickly and completely the required information is provided to DEC [i.e., driller logs, source evaluation report]
  - Nicole added that it seems it will be the logistical factors like contractors and materials rather than regulatory requirements that will greatly affect the timeline

### **WL-06 Update**

- Background: Either as primary or back-up well, CFD2 wants to pursue a second well location concurrently and independently of WL-05. Potential site is on Sterling property, but the protected area overlaps with private land.
- Nicole and colleagues at Sterling tried to locate the existing well on the private property (with permission) so that it can be tested for PFAS. Unfortunately, they have not been able to locate the well and fear it may have been buried. Discussion about whether it is necessary to find all wells listed on the ANR database. Jon confirmed that they would search for any wells within 1000 feet looking for surface features and that it would not be unusual to locate wells not listed or not find wells that are. The database would be updated accordingly.
- Nicole reported that in looking at the exhibits shared previously by Jeremy Rathbun, it's possible that the property lines have since been redrawn and not reflected in the

---

ANR database because there is a well at Cedar Cottage that she knows is there and used, but it is not on the exhibit. So perhaps the well they were looking for is the one at Cedar College.

- Nicole is in conversation with the landowner and providing them with details about the impact the protected area restrictions could have. Nicole asked for clarification on what the next steps would be to move WL-06 forward. Sterling's Board is aware of the project but there is nothing concrete for them to vote on just yet. There is a regular board meeting in July. Nicole and Jon will write up what the Board needs to know to vote on allowing WL-06 to be located on Sterling property.
- Gina noted that keeping on top of WL-06 is really important as it is only a few months behind WL-05. Nicole added that if WL-05 is not completed in time, it's possible that the two wells could be done concurrently with potential cost-savings.

### **Generator Project (Jon Ashley)**

- Reaching out to vendor to determine what hardware they require
- Plans in place to mark location for the concrete pad on Friday (June 3)
- Arranging to have an excavator available in mid June
- Confirmation that the generator is available , but the variable frequency drives will not be arriving until August
- Paula asked when she should expect bills. Jon said to expect a bill in early July.

### **Next Meeting**

The Board agreed to cancel their regular monthly meeting scheduled for Monday June 6th. A meeting later in the month may be scheduled if there are projects or other issues that merit Board deliberations.

---

## Actions Items

- Paula will send accounting of bottled water expenses to date and projections to DEC
- Nicole and Jon will write up CFD2's specific asks of Sterling College's Board regarding allowing WL-06 on Sterling property
- Gina will send a note to DEC indicating that the Board does not want to pursue the state's interim blending and monitoring recommendations at this time. (This was submitted to DEC on June 1st.)

## Next Meetings

The next **Regular Meeting**, scheduled for **Monday, June 6th, is cancelled.**

The next Regular Meeting will be on Monday, June 27. A reminder announcement with the Zoom link (<https://us02web.zoom.us/j/87324152544>) will be posted on Front Porch Forum.

NOTE: The Zoom link and call-in details are the same for both (and all remaining 2022) meetings.

Call in Details:

Meeting ID: 873 2415 2544

One tap mobile

+13017158592,,87324152544# US (Washington DC)

+13126266799,,87324152544# US (Chicago)

Dial by your location

+1 301 715 8592 US (Washington DC)

+1 312 626 6799 US (Chicago)

+1 646 876 9923 US (New York)

+1 253 215 8782 US (Tacoma)

+1 346 248 7799 US (Houston)

+1 408 638 0968 US (San Jose)

+1 669 900 6833 US (San Jose)

Meeting ID: 873 2415 2544