Findings of Fact & Reclassification Order

Groundwater Reclassification in Bennington and Shaftsbury due to PFAS Contamination
Bennington, Village of North Bennington, and Shaftsbury

October 2021

Prepared by:

The Vermont Agency of Natural Resources

Final
Findings of Fact & Reclassification Order
Groundwater Reclassification in Bennington and Shaftsbury
PFAS Contamination

INTRODUCTION

This document represents the Vermont Agency of Natural Resources (ANR) findings and determination (Reclassification Order) to reclassify groundwater from Class III to Class IV for an area located in the Towns of Bennington and Shaftsbury and the Village of North Bennington. This Class IV designation means that at least a part of the underlying groundwater is not suitable as drinking water due to the presence of per- and polyfluoroalkyl substances (PFAS) in groundwater above the applicable regulatory standards. This document is divided into the following section:

- **Introduction**
- **Overview**- explains the reasons groundwater is being reclassified and the rationale for the reclassification order.
- **Background**
- **Petition and Supporting Documents**-provides a description of the groundwater reclassification petition and the documents that supported this petition and order.
- **Class IV Area**-describes how Class IV boundaries were determined.
- **Monitoring Requirements**-describes the monitoring that will take place within the reclassification area.
- **Public Notification**-describes the public notification process for the reclassification.
- **The Finding of Facts and the Reclassification Order**-contains the formal reclassification order that reclassifies the groundwater from Class III to Class IV, along with conditions.

The sections leading up to the Finding of Facts and the Reclassification Order supplement the formal order by providing context for the groundwater reclassification.

OVERVIEW

The reclassification addresses the presence of PFAS found in some parts of the underlying groundwater within Bennington, the Village of North Bennington, and Shaftsbury as shown on the map in Attachment A. This formal reclassification order is in response to the groundwater reclassification petition (Attachment B), dated January 28, 2021, submitted by Barr Engineering Company (Barr) on behalf of Saint-Gobain Performance Plastics. A list of the supporting documentation used in issuing this order is provided in Attachment C. This petition was submitted to meet the requirements specified in the following documents related to groundwater reclassification and institutional controls:

- The Vermont Groundwater Protection Rule and Strategy, effective July 6, 2019;

- The Consent Order and Final Judgment between the State of Vermont and Saint-Gobain Performance Plastics, effective May 2019 (referred in the remainder of the document as the Consent Order); and

- The ANR-approved corrective action plans for the Bennington-wide PFAS response pursuant to the authority under 10 V.S.A. §6615b and the Vermont Investigation and Remediation of Contaminated Properties Rule:

    - Interim Measures Corrective Action Plan for Public Water System (PWS) Extensions Corrective Action Area I Operable Unit A, dated August 11, 2017;
    - Interim Measures Corrective Action Plan for Public Water System (PWS) Extensions Corrective Action Area II Operable Unit A, dated June 7, 2019;
    - Corrective Action Plan for Public Water System (PWS) Extensions Corrective Action Area II Operable Unit C, dated March 19, 2020; and
    - Corrective Action Plan 2-Corrective Action Areas I and II – Operable Unit B, North Bennington, and Bennington, dated March 2020.

As stated in the ANR Record of Decisions and Selection of Remedies (Appendices D and D1) of the Consent Order, ANR determined that active remediation was not technically feasible nor cost effective to remove PFAS contaminated area-wide groundwater. The selected corrective actions focused on providing long-term drinking water remedies and implementing institutional controls, primarily groundwater reclassification, to restrict groundwater use given the expected persistence of PFAS in parts of the underlying groundwater.

Reasons and Purpose of this Class IV Designation

Groundwater in Vermont, by default, is considered Class III groundwater unless reclassified. Class III groundwater means it is suitable for being used as drinking water, that is, a potable or public water supply. In the Bennington area, reclassification of area-wide groundwater from a Class III to a Class IV designates and maps where much of the underlying groundwater are expected to have PFAS levels above the Vermont Groundwater Enforcement Standards or the Maximum Contaminant Levels (MCLs), that is, the applicable regulatory standards, for more than five years, likely decades. The Vermont Groundwater Enforcement Standards and MCLs for PFAS is 20 ng/L for the cumulative total of perfluorooctanoic acid (PFOA), perfluorooctane sulfate (PFOS), perfluoroheptanoic acid (PFHpA), pefluorononanoic acid (PFNA), and perfluorohexane sulfate (PFHxS). The boundary of the proposed reclassification area is the same boundary as the Corrective Action Area as defined in the Consent Order, with one modification, the addition of one parcel in the northeastern portion of the reclassification area.

The main purpose for reclassifying the groundwater to Class IV within the area shown on the map in Attachment A is to protect human health and the environment by providing an institutional control that requires notification of landowners, well drillers, and regulatory agencies that groundwater is or may be contaminated by PFAS. ANR recognizes the practical and policy issues in reclassifying an area so large. The proposed reclassification order attempts to balance the following:

- Public notification that parts of the underlying groundwater within the proposed reclassification likely has PFAS levels above the applicable regulatory standards;

- Restrictions on the issuance of State permits that authorize the public to use groundwater with PFAS levels above the applicable regulatory standards within the Class IV area for potable purposes, especially newly permitted wells;

- Area-wide groundwater within the proposed Class IV area, particularly shallow groundwater but also deeper groundwater in many areas, likely has PFAS at levels that may not be suitable as a source of drinking water (potable or public water systems) or may not be suitable for non-potable uses, such as agriculture, commercial, industrial, or geothermal use;

- The reality that in many areas within the proposed reclassification boundary, the installation of a new well is the only practical source for a potable or public water supply;

- Potable water can be found within the proposed reclassification area as evidenced by the over 130 water supply wells that are either non-detect for PFAS or have PFAS levels below the applicable regulatory standards;

- The potential for degrading groundwater quality and spreading PFAS to other parts of the aquifer due to drilling new wells within the Class IV boundary, and

- Consistency with the requirements in the Consent Order and the approved corrective action plans.

The proposed Reclassification Order will prohibit, unless there are extenuating circumstances approved by ANR, the installation of a drinking water supply well (potable or public water supply) for a resident or business that is located within 200-feet of an existing municipal waterline.

The ANR does consider municipal connections as the preferred long-term drinking water remedy for all areas and encourages property owners to connect to municipal water whenever feasible. However, there are parcels, or parts of parcels, where connecting to waterlines is not technically feasible or may be economically prohibitive. This proposed Reclassification Order will allow for the possibility of installing a new drinking water well for development located more than 200 feet away from a waterline, provided that the well is constructed following the specifications in Attachment D, or meets an equivalent standard as determined by ANR. The ANR considers the well construction specifications in Attachment D as best management practices to mitigate further impairment of groundwater quality or the spreading of contamination within the Class IV boundary. If ANR determines that there are sufficient extenuating conditions in which connecting to a waterline is not technically or economically feasible, then a new drinking water well for a building or structure within 200 feet of a waterline must also be constructed following the specifications in Attachment D, or an equivalent standard as determined by ANR.

This proposed Reclassification Order will prohibit the use of new overburden wells or springs as a potable or public water supply, given the likelihood that such a well will have groundwater that is contaminated with PFAS above the applicable standards. This order will not affect the existing use of overburden wells or springs as a potable or public water supply. The Vermont Department of Environmental Conservation, Waste Management and Prevention Division will need to be notified prior to any new well being installed for industrial, commercial, and geothermal use so they can assess the suitability of such well or

use in light of the Class IV designation. The Agency of Agriculture, Food, and Markets will need to be notified prior to any new well being installed for agricultural use so they can assess the suitability of such well or use in light of the Class IV designation.

Summary of supporting documentation for this Reclassification Determination

The findings and Reclassification Order are based on the considerations outlined in Section 12-506 of the Vermont Groundwater Protection Rule and Strategy, effective July 6, 2019. A copy of the rule is available online at https://dec.vermont.gov/water/groundwater or by contacting the Vermont Department of Environmental Conservation, Waste Management and Prevention Division, One National Life Drive, Davis Building-1st floor.

The petition to reclassify and other supporting documents is available online at //dec.vermont.gov/bennington-groundwater-reclassification. Much of the information contained in this order was obtained from the following:

- Petition to reclassify groundwater prepared by Barr, dated January 28, 2021;
- Barr Response to Technical Comments from ANR, dated October 23, 2020;
- Conceptual Site Model Site Investigation Report: Bennington, Vermont, prepared by Barr, dated March 2018; and
- Record of Decision and Selection of Remedies for Corrective Action Area I and Corrective Action Area II-(Appendix D1) of the Consent Order.

The petition, final decision and Reclassification Order will also be available at the Bennington Town Offices-205 South St, Bennington VT.

BACKGROUND

Two former Teflon-coating facilities were operated in Bennington by Chemfab. The first Teflon-coating facility located on Northside Drive in Bennington operated from 1969 to 1978. The second Teflon-coating facility on Water Street in North Bennington operated from 1978 to February 2002.

In February 2016, PFAS, primarily PFOA, were discovered in drinking water wells in the vicinity of the former Teflon-coating facility in North Bennington. Subsequent sampling found PFAS above the Vermont Groundwater Enforcement Standards in over 330 drinking water wells, mainly private residences, within Bennington, the Village of North Bennington, and portions of Shaftsbury. The initial response to this area-wide groundwater contamination was to provide bottled water and to install point-of-entry treatment systems (POETs) to remove PFAS. Over the next several years, subsequent response actions included connecting homes/businesses to municipal waterlines under approved corrective action plans; site investigation activities (soil boring, monitoring wells; sample collection of groundwater; surface water; springs; sediment; agricultural products; and fish) and the development of a Conceptual Site Model (CSM). A CSM provides a representation of the likely major contaminant sources; how the contaminants are moving through environmental media, particularly groundwater; and the degree and extent of the contamination in present time and into the future based on available technical and site investigation data. The CSM serves as the foundation for any proposed activities, remedial or protective, and is updated as needed based on future monitoring results or new information.

Waterline work is now substantially complete. There are 486 residences/businesses eligible to be connected to municipal water as part of approved the corrective action plans. Four-hundred

forty-six (446) residences/businesses have chosen to be connected to municipal water and are now connected. As a condition of connecting, the water supply wells are disconnected from the residence/business and properly abandoned to ensure there is no contaminated water getting into the municipal system. Also, the closure of these individual water supplies removes a possible pathway for surface water or groundwater contaminated with PFAS to move vertically along the well into the underlying aquifers. The closure of these wells also eliminates the possibility that these wells could be used for drinking water in the future.

There are parts of the Corrective Action Area, which is within the proposed Class IV reclassification area, where it was determined not feasible to connect residences or businesses to municipal water. In those areas, Saint-Gobain Performance Plastics, who purchased Chemfab in 2000 and operated the facility until it closed in February, 2002, is obligated under the Consent Order to continue operating and monitoring existing POETs; evaluate residences/businesses with treatment systems for the feasibility of other long-term drinking water remedies, such as replacement wells or potential connection to a waterline, if they are nearby; and continue long-term monitoring of drinking water wells that are currently below the applicable regulatory standards.

Based on information provided in the Conceptual Site Model Site Investigation Report: Bennington Vermont, prepared by Barr, dated March 2018, and documented in the Record of Decision and Selection of Remedies for Corrective Action Area I and Corrective Action Area II-(Appendix D1) of the Consent Order, ANR determined that past air emissions from two former Teflon-coating facilities caused area-wide PFAS contamination in groundwater and PFAS in groundwater is expected to exceed the applicable regulatory standards for over five years, if not decades.

PETITION

ANR has determined that the Groundwater Reclassification Petition prepared by Barr on behalf of Saint-Gobain Performance Plastics, dated January 28, 2021, is administratively and technically complete. The petition is consistent with the reclassification requirements specified in Subchapter 5-in the Vermont Groundwater Protection Rule and Strategy, effective July 6, 2019, and the Vermont Procedure for Class IV Groundwater Reclassification, effective July 5, 2018. This petition references the Conceptual Site Model Site Investigation Report: Bennington, Vermont, prepared by Barr, dated March 2018, which provides the technical basis for this reclassification. This report addresses the technical information required in Section 12-503(c) and Section 12-504 (c) of the Vermont Groundwater Protection Rule and Strategy, dated July 6, 2019. Referencing this Barr report in the petition also meets the requirements of the Vermont Procedure for Class IV Groundwater Reclassification, given that the area-wide Bennington PFAS response is being managed pursuant to the requirements in the Consent Order and the Investigation and Remediation of Contaminated Properties Rule (IRCPR).

CLASS IV AREA DESIGNATED IN THE PETITION

The Class IV boundary matches that of the Corrective Action Area boundary as established in the Consent Order (Attachment A), except the addition of one parcel due to PFAS concentrations being recently found in water supply wells on this parcel above Vermont Groundwater Enforcement Standards for PFAS. The reclassification boundaries followed the nearest parcel boundaries that reflects the current knowledge about the degree and extent of PFAS contamination in groundwater and its movement through the environment obtained from the following:

- The collection and analysis of data and information summarized in the report entitled, Conceptual Site Model Site Investigation Report: Bennington, Vermont; and
- The PFAS sampling results of over 700 private water supplies as shown on the map in Attachment A.

The east-west boundaries extend roughly from the Vermont-New York state line to the Green Mountain National Forest boundary. The northern boundary roughly follows the Bennington-Shaftsbury town line, however, portions of the Class IV extend into Shaftsbury. The southern boundary roughly follows VT State Route 9.

Attachment A also depicts the peak concentration of drinking water well results and shows these results relative to the proposed Class IV boundaries.

MONITORING REQUIREMENTS

As part of the requirements of the Consent Order, Saint-Gobain Performance Plastics is obligated to perform long-term monitoring per an approved corrective action plan. A corrective action plan, entitled "Corrective Action Plan 2-Corrective Action Areas I and II – Operable Unit B by Barr Engineering Company on behalf of Saint-Gobain Performance Plastics" was approved by ANR in April 2020. This plan includes a long-term well monitoring plan and a long-term natural attenuation monitoring plan for PFAS in groundwater. This long-term monitoring will provide the data to help assess whether adjustments to the Class IV boundary will be needed in the future. These adjustments could be to expand, contract, or reclassify the Class IV area back to a Class III designation, as demonstrated by future monitoring data, new technical information, or both.

PUBLIC NOTIFICATION OF PETITION AND DRAFT RECLASSIFCATION ORDER

The public notification of the administratively complete petition and the draft Reclassification Order followed the public participation requirements in Section 12-505 of the Vermont Groundwater Protection Rule and Strategy and Vermont Procedures for Class IV Groundwater Reclassification, which consisted of the following:

- Notification of the Petition and Draft order on the Vermont Environmental Notice Bulletin (ENB);
- Written notice to all property owners within and immediately adjacent to the proposed groundwater reclassification area; List of property owners can be found in the petition.
- Advertisement in the Bennington Banner about the proposed reclassification.
- Written Notice to the town clerks for Bennington and Shaftsbury;
- Written Notice to the Bennington County Regional Commission; and
- Written Notice to the Vermont Groundwater Coordinating Committee.

The original deadline to receive public comments was March 19, 2021, which was 30 days from when the petition and draft order was placed on the Environmental Notice Bulletin (ENB). However, the deadline was extended several times. These extensions were in response to requests from the public and elected officials. The final deadline to receive comments was May 28, 2021. The ANR participated in multiple public meetings about the proposed reclassification. These meetings are listed below:

- ANR-led Virtual Public Meetings on March 4, 2021, and May 11, 2021;

- Bennington Selectboard Meeting on April 12, 2021;
- Village of North Bennington Trustee Meeting on April 13, 2021;
- Shaftsbury Selectboard Meeting on April 19, 2021

The ANR received multiple formal and informal comments on the proposed groundwater reclassification. The ANR responsive summary to the public comments and a copy of the comments can be found in Attachments E and F, respectively. Most of the comments focused on the effect of reclassifying the groundwater to a Class IV designation will have on property values. Comments also expressed confusion about why the ANR was declaring that the groundwater was non-potable given that over 130 water supply wells within the proposed reclassification area have either had no PFAS detected in their well or had PFAS levels below the applicable regulatory standards since sampling for PFAS began in the area in 2016.

After reaching out to many of the commenters and public officials about their concerns, the Finding of Facts and the Reclassification Order were revised to:

- Acknowledge that potable water is present and can be found within the proposed reclassification area, as evidenced by the over 130 water supply wells that are either non-detect for PFAS or below the applicable regulatory standards;
- Clarify that the Class IV designation does not apply to existing water supplies that continue to test below the applicable regulatory standards for PFAS. This means that these wells are potable;
- Specify the criteria on which a water supply that has or has had PFAS will be considered potable in the future, meaning that the Class IV designation would no longer apply to this water supply; and
- Clarify the conditions on which newly permitted wells are considered a potable water supply, meaning the Class IV designation does not apply.

These proposed changes to the Finding of Facts and the Reclassification Order were presented at the ANR-led virtual meeting on May 14, 2021. The general feedback from these proposed changes was positive from those community members and public officials who were in attendance, many of which had provided comments previously opposing the reclassification. Attachment G includes the proposed changes to the Finding of Facts and the Reclassification Order (changes highlighted in yellow). The final Finding of Facts and Reclassification Order presented later in this document reflects these changes. Note, minor non-substantive changes were made to Final Finding of Facts and Reclassification Order for clarity and to correct grammar errors.

The final order, found below, will serve as the basis for the final decision and delineated reclassification area.

Findings of Fact

- Barr Engineering, on behalf of Saint-Gobain Performance Plastics, has submitted an administratively complete reclassification petition. The final petition was received on January 28, 2021. The Vermont Agency of Natural Resources (ANR) determined that the petition was administratively and technically complete on February 5, 2020.

- The ANR has reviewed the petition and determined that the factual information provided in the petition and other documents referenced in the petition or this Decision Document are in accordance with the requirements of Sections 12-503 and 12-504 of the Vermont Groundwater Protection Rule & Strategy and 10 V.S.A. Chapter 48. This information supports the reclassification of groundwater to a Class IV as shown on map in Attachment A. The final approved Class IV boundary is located on the ANR Atlas.

- Extensive environmental investigations, as summarized in the petition, have identified a zone of PFAS groundwater contamination (Attachment A) that exceeds the Vermont Groundwater Enforcement Standards and the Maximum Contaminants Levels (MCLs), that is, the applicable regulatory standards. The major source of the groundwater PFAS contamination appear to be the leaching through soils from past air emissions of two former Teflon coating facilities. Given this contaminant pathway and results of the environmental investigations, it appears, in general, that the highest PFAS levels are found in shallow groundwater.

- Per the requirements in Section 12-502 of the Groundwater Protection Rule & Strategy, reclassification is required because much of the underlying groundwater within the proposed Class IV boundary area (Attachment A) exceeds the Vermont Groundwater Enforcement Standards for PFAS, and the PFAS contamination in groundwater is predicted to persist for more than five years, likely decades.

- Area-wide groundwater within the proposed Class IV area, particularly shallow groundwater, is contaminated to the point that it may not be suitable as a source of drinking water for potable or public water systems and may not be suitable for non-potable uses, such as agriculture, commercial, industrial, or geothermal use.

- Potable water can be found within the proposed reclassification area as evidenced by the over 130 water supply wells that are either non-detect for PFAS or below the applicable regulatory standards.

- ANR considers the connection to a municipal water system as the preferred long-term drinking water remedy for all properties within this proposed Class IV and will strongly encourage property owners to connect where feasible; however, there are locations where connecting to a municipal water system are not technically feasible nor economically viable, given the size and population densities of some parts of the proposed Class IV area. In some cases, homeowners strongly objected to connecting to municipal water. In these cases, the homeowners were allowed to keep their existing drinking water well but were responsible to maintain any treatment system that was installed to remove PFAS.

Reclassification Order

The Secretary of the Agency of Natural Resources (ANR) hereby makes the Findings of Fact identified above and reclassifies the groundwater to Class IV for the area identified on the map in Attachment A, subject to the following conditions and clarifications:

1. All existing water supplies that have not had an exceedance from testing above the applicable regulatory standards for per-and polyfluoroalkyl substances (PFAS) and continue to test below the applicable regulatory standards are considered a potable water supply with respect to PFAS, which means the Class IV designation does not apply to these water supplies. The applicable regulatory standards are the Maximum Contaminant Level (MCL) for public water supplies and the Vermont Groundwater Enforcement Standards (VGES) for all other potable water supplies.

2. Water supplies that have or have had PFAS concentration above the applicable regulatory standards are considered a potable water supply with respect to PFAS, as defined in #1 above, once the following criteria are met:

    i. Testing shows that PFAS levels have met the performance standard in Appendix A of the Consent Order for being eligible to remove a treatment system from a water supply. This performance standard is eight (8) consecutive rounds of quarterly sampling, showing an overall downward trend in PFOA, PFOS, PFHxS, PFHpA, and PFNA contaminant levels in the water supply or a flat trend if the contaminant level is below the applicable regulatory standards.

    ii. Continued testing shows PFAS levels below the applicable regulatory standards.

3. The installation of a new permitted drinking water well (a potable or public drinking water well) may be allowed for a building or structure outside 200-feet of an existing waterline or within 200-feet if given a variance by ANR, provided the following are met:

    i. The new well is constructed following the requirement specified in Attachment D, or an acceptable equivalence, as determined and approved by ANR;
    ii. Prior to use, the water must be tested for PFAS that are regulated under either the Vermont Groundwater Protection Rule and Strategy or the Vermont Water Supply Rule, as may be amended. At the time of this order, there are five regulated PFAS: PFOA, PFOS, PFHpA, PFNA, and PFHxS. The current standards are 20 ng/L for the combination of the five regulated compounds. The water samples must be sampled using a laboratory method that is accepted by ANR. At the time of the issuance of this order, EPA Method 537.1 was the exclusive Laboratory Method accepted by ANR for drinking water supplies. Results of the water test shall be submitted to the Vermont Department of Environmental Conservation, Drinking Water and Groundwater Protection Division for review and approval prior to use of the water supply well;
    iii. The submittal of a long-term monitoring plan for PFAS testing to the Vermont Department of Environmental Conservation, Drinking Water and Groundwater Protection Division for review and approval, or verification that this well is part of a long-term monitoring plan under an ongoing corrective action being performed by Saint-Gobain Performance Plastics pursuant to the requirements of the Consent Order and an approved corrective action plan by ANR. Monitoring will be required until there is sufficient data and information, as determined by

ANR, that long-term monitoring is no longer warranted. Results from the ongoing monitoring must be provided by the permittee to the Vermont Department of Environmental Conservation, Drinking Water and Groundwater Protection Division as specified in the conditions of any applicable permit, unless this well is being monitored as part of work performed by Saint-Gobain Performance Plastics under the requirements of the Consent Order and an approved action plan by ANR; and

iv. If the PFAS concentrations in a water sample from a well are above the regulatory standards for the regulated PFAS, then a suitable point-of-entry system (POET), or other long-term remedy approved by ANR, must be installed. If a treatment system is not required as part of an approved corrective action plan overseen by ANR, then a design plan of the long-term remedy must be submitted for review and approval to the Vermont Department of Environmental Conservation, Drinking Water and Groundwater Protection Division, along with an operation and maintenance plan for the proposed remedy.

4. All newly permitted wells (potable and public) that meet the conditions outlined in #3 above, have PFAS levels below the applicable regulatory standards, and continue to test below the applicable regulatory standards, are also considered a potable water supply with respect to PFAS, as defined in #1 above.

5. New overburden wells, springs, or shallow dug wells for drinking water wells are prohibited.

6. The VT Department of Environmental Conservation, Waste Management and Prevention Division must be notified prior to any new well being installed for industrial, commercial, or geothermal use so they can assess the suitability of such well or use in light of the Class IV designation.

7. The Agency of Agriculture, Food, and Markets must be notified prior to any new well being installed for agricultural use so they can assess the suitability of such well or use in light of the Class IV designation.

8. Long-term monitoring within the Class IV is required by Saint-Gobain Performance Plastics, consistent with the approved corrective action plan, entitled, “Corrective Action Plan 2-Corrective Action Areas I and II – Operable Unit B North Bennington and Bennington”, dated March 2020, prepared by Barr, or any subsequent updates to this plan approved by ANR. This long-term monitoring will provide groundwater data to assess whether adjustment (expansion, contraction, or reclassification back to a Class III) of the Class IV designation is warranted.

Julie Moore, Secretary
Agency of Natural Resources

Date 11/02/2021

Attachments

Attachment A Map Showing Class IV Reclassification Area-Also included on the ANR website dedicated to the Bennington Class IV Groundwater Reclassification **https://dec.vermont.gov/bennington-groundwater-reclassification**

Attachment B-Groundwater Reclassification Petition dated January 29, 2021-Text only included in this Attachment. This petition as well as the supporting documentation will be provided on the Bennington Class IV Groundwater Reclassification website due to the size of the supporting documentation

Attachment C- List of Reports and Corrective Action Plans referenced in this Order-These documents are also accessible through the Bennington Class IV Groundwater Reclassification website.

A**ttachment D-Well Construction Design Requirements for New and Replacement Well within the Class IV Boundary-**This document is also accessible through the Bennington Class IV Groundwater Reclassification website.

Attachment E- Responsiveness Summary of Public Comments-This documents provides the ANR's response to questions and comments received during the public comment period. This document is also accessible through the Bennington Class IV Groundwater Reclassification website.

Attachment F- Copy of Formal Comments in response to proposed Class IV Reclassification- This document is also accessible through the Bennington Class IV Groundwater Reclassification website.

Attachment G- Proposed changes to the February 2021 Draft Finding of Facts and the Reclassification Order (changes highlighted in yellow).
A list of the supporting documentation used in issuing this order is provided in Attachment C. This document is also accessible through the Bennington Class IV Groundwater Reclassification website.