



**FREQUENTLY ASKED QUESTIONS: STATE OF VERMONT  
CONSENT ORDER WITH SAINT-GOBAIN**

July 26, 2017

***Drinking Water Remedy***

***Q: How did the Agency of Natural Resources determine what the permanent drinking water remedy would be for homes in Corrective Action Area I?***

A: The Agency of Natural Resources (ANR) must evaluate several criteria when selecting a remedy: (1) compliance with legal requirements; (2) protection of human health and the environment; (3) long-term effectiveness and permanence; (4) reduction in toxicity, mobility, or volume of contamination through treatment; (5) short-term effectiveness; (6) implementability; (7) cost; and (8) community acceptance. As a general matter, ANR's preference to address contaminated wells is to connect impacted owners to a municipal water line given the certainty, stability, and predictability associated with a municipal water source. However, connection to a municipal water system in some cases may not be practicable for a variety of factors. For example, connecting one home at the end of a long water line may create water quality problems (e.g., harmful disinfection by-products) because water may sit stagnant in the line. Appendix D of the consent order describes the process and the rationale for ANR's approval of the drinking water remedies for Corrective Action Area I—a combination of connection to municipal water, installation of a replacement well where technically feasible, and operation and maintenance of a Point of Entry Treatment System (POET).

***Q: What long-term drinking water options did ANR evaluate?***

A: ANR considered connection to a municipal water line, installation of a replacement well, and long-term use of POETs.

***Q: Are POETs a long-term solution for removing PFOA?***

A: POETs are effective at removing PFOA and PFOS from drinking water. As a general matter, the State's preference to address contaminated wells is to connect impacted owners to a municipal water line given the certainty, stability, and predictability associated with a municipal water source. However, connection to a municipal water system in some cases may not be practicable for a variety of factors, including water quality considerations and costs. When properly monitored and maintained, POETs are an effective long-term remedy to address releases of PFOA. The State evaluates POETs to determine if POETs are an appropriate long-term remedy based on several factors, including permanence, community acceptance, cost-effectiveness, and other factors. There is an annual cost to replacing UV lamps and carbon filters

yearly, with filters sometimes requiring even more frequent replacement, and costs associated with regular sampling. Under the terms of the consent order, Saint-Gobain is responsible for costs associated with long-term operation and maintenance of POETs in Corrective Action Area I – Operable Unit B.

***Q: The current level of PFOA in my well is below 20 ppt. What happens if levels increase above 20 ppt in the future?***

A: Under the terms of the consent order, Saint-Gobain must comply with a long-term sampling program to monitor PFOA levels for homes that are currently below 20 ppt. At any time, if PFOA levels are at or above 20 ppt, Saint-Gobain must immediately provide bottled water and install a POET within 30 days of receipt of the laboratory analysis. ANR may authorize Saint-Gobain to connect the home to a municipal water line or install a replacement well if technically feasible.

***Q: Why doesn't the consent order include a drinking water remedy for homes in Corrective Action Area II?***

A: Based on available information, it is ANR's position that air deposition from Saint-Gobain's facilities on Water Street and Northside Drive are sources of the PFOA identified in North Bennington and Bennington, including areas east of the railroad tracks near Route 7a. Saint-Gobain does not agree with ANR at this time. To allow the long-term drinking water remedy and final resolution to move forward where ANR and Saint-Gobain agree (Corrective Action Area I), ANR and Saint-Gobain entered into the consent order. The Agency and Saint-Gobain both agree that additional data collection in the area east of 7a should help resolve this disagreement.

Under the terms of the consent order, Saint-Gobain must complete a site investigation on an expedited schedule. Following that investigation, Saint-Gobain must submit a plan to address PFOA, including a proposed drinking water remedy, no later than 90 days from ANR's approval of the site investigation report if Saint-Gobain and the State reach agreement that Saint-Gobain is responsible for PFOA in this area. Saint-Gobain would then be required to perform corrective actions and provide the permanent drinking water remedy in accordance with a schedule approved by ANR.

If the State and Saint-Gobain are unable to reach an agreement, the State will use all authority provided by Vermont law to pursue long-term drinking water solutions for all impacted residents.

***Q: Will I have any input into determinations about my drinking water remedy?***

A: Yes. The engineers and ANR met with many individuals during the final phase of the water line design process. ANR also met with each homeowner with PFOA levels above 20 ppt in Corrective Action Area I – Operable Unit B to discuss why connection to the municipal water line was not feasible and alternative options for a long-term drinking water solution. ANR is

accepting comments from the public until August 25, 2017 on the terms and conditions of the consent order before finalizing the consent order.

### ***Municipal Water Line Connections***

***Q: Will construction of municipal water line extensions begin in 2017?***

A: Construction for both projects is expected to begin in the fall of 2017. North Bennington is expected to begin the bid process on August 1, 2017 with a bid opening date of August 24, 2017. Bennington is expected to begin the bid process on August 7, 2017 with a bid opening date of August 30, 2017.

***Q: What type of water quality concerns might arise with connection to the municipal water line?***

A: In January 2010, Vermont adopted a law to limit the amount of lead allowed in plumbing fixtures, solder and flux used in plumbing. Many homes and businesses with internal plumbing installed prior to the passage of this law may contain higher concentrations of lead content. Changing the building's source of drinking water may temporarily cause older plumbing fixtures located within existing residential structures to leach lead into the drinking water. This is due to the change in water chemistry, and is normally corrected by corrosion control measures routinely being implemented by the municipal water district to minimize lead concentration in drinking water being provided to their customers. To ensure the safety of the users during the transition, water sampling for lead will occur at homes and businesses to establish baseline understanding of the chemistry changes and lead level concentrations in high risk homes. Based on these results and other risk factors, the municipalities will conduct follow-up lead sampling after the connection to public water and will continue to sample until lead levels are decreasing and below the lead action level of 15 parts per billion. This sampling is being done as a precaution to ensure the water provided is below the lead action level. Neither the Bennington nor the North Bennington public water systems have exceeded the lead action level since 1993.

***Q: I like my well water. I feel that the water is safe with the point-of-entry treatment (POET) system and bottled water provided. Can I keep my well connection? If so, will Saint-Gobain pay the costs associated with operating and maintaining the POET and bottled water delivery?***

A: ANR recommends that all homes that are eligible to connect to a municipal water line connect to the municipal water line. Where it is feasible, the State's preference to address contaminated wells is to connect impacted owners to a municipal water line given the certainty, stability, and predictability associated with a municipal water source. If an eligible homeowner chooses not to connect to the municipal water line, Saint-Gobain is not obligated under the consent order to pay for the costs associated with operation and maintenance of the POET and/or bottled water. These costs would be the responsibility of the homeowner who chooses not to connect to municipal water.

***Q: Is Municipal Water Safe to Drink?***

A: Yes. The Village of North Bennington Water Department and the Bennington Water Department are both Public Community Water Systems regulated by ANR, subject to the Federal Safe Drinking Water Act and the Vermont Water Supply Rule. These regulations contain stringent requirements that ensure the water provided to the system's users is protective of public health and does not pose a public health risk. These regulations include routine monitoring requirements that require water systems to collect routine samples for analysis of almost 100 regulated contaminants. These systems routinely collect samples from source water, treated water entering the distribution system, as well as throughout the distribution pipe network for analysis of inorganic and organic chemicals, lead and copper concentrations, disinfection byproduct concentrations, and the presence of pathogens such as cryptosporidium and E.coli or fecal coliform bacteria. During the design of the municipal waterline extensions, the professional engineers responsible for the designs performed technical analyses to evaluate water quality data from the existing water systems and employ construction alternatives designed to meet all applicable regulatory criteria regarding water quality.

***Q: Who will pay the quarterly water fees?***

A: Once a connection has been established, the homeowner is responsible for payment of quarterly water fees under the terms of the consent order. The scope of work associated with extension of the municipal water line service includes connecting municipal water lines to the existing internal plumbing within the home or business; closure of existing well and removal of well pump, POET, and pressure tank; and restoration of property disturbance. It does not include water usage costs or replacement of existing internal plumbing. The consent order does not provide Saint-Gobain with a release for liability of private legal claims.

***Q: Will my property be restored to its existing condition after construction of the municipal water line connection is complete?***

A: Yes. The construction contracts will require that all work done on private property be done carefully and restored to existing or better condition. The engineer will discuss the work beforehand with each homeowner.

***Q: Can I keep my well open to water my garden, wash my car, fill my pool etc.? Can I switch back to my well, if for any reason I do not like the municipal water service?***

A: No. Once a connection to municipal water has been established, the drinking water well will be sealed and abandoned pursuant to ANR regulations unless it is designated as a monitoring well for long-term groundwater monitoring.

***Q: What will happen to my well and associated equipment (pump, pressure tank) when I connect to Town water?***

A: Your well will be sealed and abandoned in accordance with ANR regulations once your home is connected to municipal water. The scope of work associated with connection to the

municipal water line includes well closure and removal of the well pump, POET, and pressure tank. Under the terms of the consent decree, Saint-Gobain is responsible for costs associated with this work for homes in Corrective Action Area I – Operable Unit A.

***Q: Could I elect to drill a separate well on my property to water my garden/lawn, feed livestock, etc. if I connect to the municipal system?***

A: No. In Corrective Action Area I, the groundwater will be reclassified as Class IV non-potable groundwater in accordance with the Investigation and Remediation of Contaminated Properties Rule and state groundwater protection rules to prohibit future use of this groundwater for human consumptive or other residential purposes in areas served by the municipal water line.

***Q: Do I have to pay to have the new water service line installed in my home?***

A: No. If you are eligible to connect to the municipal water line under the terms of the consent order, you do not have to pay for the connection to the municipal water line. The scope of work associated with extension of the municipal water line service includes connecting municipal water lines to the existing internal plumbing within the home or business; closure of existing well and removal of well pump, POET, and pressure tank; and restoration of property disturbance.

If you decide not to connect to municipal water at this time, the contractor will install a service line stub and valve (curb stop) on the distribution system main water line. *You may be able to connect to the municipal water main at a future date, but you would be responsible for all expenses associated with the installation of the new service line, including any necessary permitting fees.*

***Q: Will I still need a water softener system?***

A: No. The water quality of the Town of Bennington/Village of North Bennington is such that a water softener is not required to provide soft water to the home.

***Q: Where does the Town water come from?***

A: The water that supplies the water systems to the Town of Bennington and the Village of North Bennington's municipal water supplies originate in the Green Mountains located to the east of Bennington. Drinking water is supplied from both groundwater and surface water supply sources for the Town of Bennington and the Village of North Bennington community water supply systems.

***Q: Does the Town have enough capacity to serve these additional homes?***

Yes. The capacity of the municipal water systems was evaluated during the engineering design process, and ANR has reviewed these assessments and concluded that both systems have adequate capacity to serve these additional connections.

## *Site Investigation Activities for Corrective Action Area II*

### *Q: Is the landfill a source of PFOA?*

A: At this time, ANR has no information that suggests the Bennington landfill is a source of the PFOA in the water supplies near and south of the landfill. Based on air modeling and initial groundwater sampling, ANR believes that air deposition from Saint-Gobain's Water Street and Northside Drive Facilities are sources of PFOA in this area.

Saint-Gobain does not agree with ANR's conclusions about the scope and extent of air deposition and the landfill at this time. However, ANR and Saint-Gobain both agree that additional data collection in the area east of the railroad tracks near Route 7a should help resolve this disagreement. There may be other sources of PFOA in Bennington and North Bennington, and ANR will continue to work with Saint-Gobain to evaluate other potential sources.

### *Q: What additional information does the State need?*

A: The additional investigation for the area east of the railroad tracks near Route 7a is designed to investigate the degree and extent of PFOA in this area, confirm the source(s) of PFOA, and identify the appropriate drinking water and clean up remedy for this area. The broad scope of work for the site investigation will close data gaps in the investigation completed to date and include: background and area-wide soil sampling, additional groundwater sampling in the area near the landfill, and additional investigation into other possible sources of PFOA.