

PREPARING A SOURCE PROTECTION PLAN UPDATE

Guidance for Public Community and Non-Transient Non-Community Water Systems

The Water Supply Division (WSD) has been assisting water systems with their source protection needs for nearly 20 years. This program is successful at protecting and preserving safe drinking water for the people of Vermont. The hard work and diligence of those involved in protecting their water is very evident. An excellent job of keeping up with the ever-changing requirements mandated by state and federal agencies is also apparent. The following guideline was developed to streamline the approval and updating process, making the most efficient use of the time and resources we have available to us.

Please use each section when organizing your Source Protection Plan (SPP) update. At the end of the process, you may find you don't need to make many changes. Even if this is so, it is important to say so in writing when addressing each section in your SPP update.

Inspect the Source Protection Area

Visually inspect the Source Protection Area (SPA) and review the potential sources of contamination (PSOC) identified in your original Source Protection Plan (SPP) or most recent SPP Update. Your inspection should consist of a physical walk through, in addition to a drive through. Some example questions you should be asking while completing the PSOC section of your update include:

- Is the farmer still growing corn on the field within your SPA? If so, does the farmer use any pesticides? If not still growing corn, what is he now doing with the land? Are there risks associated with the new activity?
- Does he spread manure? How often? Can you ask the farmer to reduce or eliminate spreading in the area closest to your source?
- Is there a gas station or other place that stores petroleum products in your SPA? Establish a relationship with the owner to alert you when and/or if a spill occurs and to help you evaluate the following questions. How old are the tanks? Is there proper containment should a spill occur? Has it been tested for leaks? If the tank is no longer in service, has it been removed or properly closed in place?
- Are the septic systems in the area properly maintained? Have landowners received outreach material on how to maintain their septic system?
- Is there a household hazardous waste collection day or a designated location for homeowners to drop off their hazardous waste so it does not end up in their septic tanks? How is this information being made available to the landowners?

Update Your PSOC Maps and Inventory

You must make reference to all PSOCs within your SPA in your update. Please also weigh their risk (high, medium, low) to your source and identify a strategic plan to minimize the risk for each PSOC. Please indicate if a PSOC has been added and consider the same circumstances as followed in the original SPP for their risk assessment (your well construction, proximity to the source, nature of contamination, probability of contamination). If a PSOC has been removed, please describe why. Also modify your PSOC map to reflect your observations, if any.

Update Your Landowner List

Visit your town clerk's office to determine whether any land or land rights within your SPA have changed hands. Add any new landowners to your list and remove anyone who no longer owns property in your SPA. A complete list of landowners should be included in each update. Those who are new to the SPA should be sent a copy of your landowner letter and pertinent outreach material.

Update Your Strategic Plan

Each PSOC strategic plan should describe a way to ensure the least amount of impact is occurring to your source. This may be something as simple as sending outreach material to residents or it might involve establishing a direct relationship with the owner of the service station across the street from your source. Or you might only have to maintain awareness on your own site if your activities are the only PSOC in the SPA.

Update Your Contingency Plan

You should update your contingency plan to reflect changes, if any, which have occurred among the personnel of your system. For example, if the responsible person or operator has changed this needs to be indicated in the contingency plan for easy reference. You should also use this section to update any emergency procedure changes that have occurred. Also, be sure the WSD is aware of changes in personnel by submitting a 'blue form' for administrative updates to our records.

Communicate with Relevant Landowners and Town/County/State Officials

Send out letters to regulatory agencies to remind them that you are concerned about land use activities in your SPA. Also, send letters to newly identified landowners who may not know about your water source. Although not required, it's a good idea to contact the other landowners within your SPA with a positive message about actions they can take to help protect your supply, and to thank them for any efforts they have made since your last letter. You do not need to include a copy of the landowner letter with your SPP update, unless you wish.

Other Useful Information

An example of what might be useful to include in your update is if your town passes zoning rules or establishes a conservation district around your source. Look back over the last three years and think about what actions you have taken to make your source less vulnerable to contamination. Have you worked with a local farmer to reduce pesticide and fertilizer use in your SPA? Have you purchased development rights for land in your SPA? Have you posted signs at key locations to notify people when they enter your SPA? Have you responded swiftly and appropriately to an emergency situation? Use the SPP Update as an opportunity to boast about the progress you have made. This list may appear daunting; however, you will quickly realize the above steps are what you followed to create your initial SPP. Once you develop a format for your update, future revisions will become easier. These steps are integral in protecting your water supply for present and future generations.

Please send your Source Protection Plan Update to the address below:

This guidance sheet and related environmental information are available electronically via the internet. For information visit us through the Vermont Homepage at <http://www.vermont.gov> or visit VT WSD directly at <http://www.vermontdrinkingwater.org>

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