Vermont Department of Environmental Conservation Drinking Water and Groundwater Protection Division

Procedure: Bulk Water Hauling as an Emergency Source

Applicability. A "Water Supplier" who owns or operates a Public Water System may supplement a public water system with Bulk Water when a public water system experiences an emergency water shortage and/or is completely out of water because of a source deficiency, distribution deficiency, or any other incident causing a loss of water. When Bulk Water is used for resupply, the Bulk Water operation shall comply with the requirements of the Vermont Water Supply Rule (Rule) and this Procedure.

"Bulk Water" is defined as drinking water delivered to consumers or water purveyors by means other than pipeline or bottled water. It is typically delivered by a tanker truck or trailer. See Subchapter 11.2 of the Rule for additional requirements for Bulk Water Hauling.

1. Bulk Water Hauling Operations; Notification and Authorization: When a Water Supplier determines that a water shortage exists and that a supply of Bulk Water is necessary, the Water Supplier shall notify the Vermont Drinking Water and Groundwater Protection Division (Division) at 802-828-1535 during normal business hours on the same or next business day of the event. The Water Supplier must complete and submit the Bulk Water Hauling as an Emergency Source form to the Division within 24 hours of the first hauling event. If hauling continues for more than one event, the Water Supplier must submit the long-term bulk hauling form, documenting all hauling events during the week until the cessation of bulk hauling.

Under the Rule, Bulk Water delivery is usually limited to temporary, emergency source of water for a public water system unless it is permitted according to the Rule. See section 11.2.1. In accordance with Section 3.0.3(c) of the Rule, a water system shall discontinue using an unpermitted source after 90 cumulative days or obtain written approval of extension by the Secretary prior to the end of the 90-day period.

- 2. **Bulk Water Hauling; Operational Requirements:** a receiving water system must comply with the following:
 - a. Maintain at least 20 psi at all points of the distribution system.
 - b. Free chlorine residual in the Bulk Water must be measured and be between 1.0 milligram per liter (mg/L) and 4.0 mg/L before it is introduced to the receiving water system.
 - c. The receiving water system shall maintain a measurable disinfection residual to the ends of the distribution system after the Bulk Water is introduced.
 - d. If the supplying water system is required to achieve 4-log inactivation of viruses, the free chlorine residual at the entry point to distribution must demonstrate that 4-log inactivation is achieved.
 - e. If the receiving water system is required to achieve 4-log inactivation of viruses it must maintain the required disinfectant residual at the entry point to distribution, and
 - f. A minimum of 1 Total Coliform sample must be taken from distribution immediately after the bulk water hauling operation.

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3. Bulk Water Hauling; Source Requirements:

- a. The Bulk Water source must be potable drinking water received from a regulated Public Community Water System (CWS) or Bulk Water System in compliance with the Rule or as otherwise approved by the Division in writing prior to delivery¹.
- b. If the bulk water is from an approved groundwater source, the Bulk Water source does not need to be disinfected prior to filling the hauling container if the water can be properly disinfected at the time of filling/transport and maintains a disinfectant residual of between 1.0 mg/L and 4.0 mg/L during transportation and delivery to the water system. All bulk water from a surface water or blended groundwater/surface water sources must contain a free chlorine residual for chlorinated systems or total chlorine for chloraminated systems prior to filling/transport.
- 4. **Bulk Water Hauling; Equipment Requirements:** Hauling/tanker requirements for hauling water are outlined in Subchapter 11.2.3 of the Rule. All hauling equipment used to supply Bulk Water shall be dedicated to the sole task of hauling potable drinking water. The water tanker, water hoses, valves, and other surfaces that come into contact with the water must be constructed of smooth, nonabsorbent, corrosion-resistant, and non-toxic material safe for contact with potable water.

5. Bulk Water Hauling; Deviation from Procedure:

- a. If any of the criteria in section 2 above are not satisfied, the receiving water system is required to distribute a Boil Water Notice to users, in accordance with sections B through G of the Boil Water Procedure. A template for the notice may be found on the Division's website: https://dec.vermont.gov/water/dwgwpd-forms
- b. If any of the criteria in sections 3(a) or 4 above are not satisfied, the receiving water system is required to distribute a Do Not Drink notice, in accordance with C through G of the Do Not Drink policy.

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¹ bulk hauling water from a system that utilizes chloramines into a system that uses chlorine may result in an unpleasant taste/odor and may be of concern for individuals with certain health conditions and should be done upon considering specific impacts to the receiving system.