

Attendees: Liz Royer, Marjorie Gail, Darlene Autery, Miles Waite, Gail Center, Jeff Comstock, Rodney Pingree, Scott Stewart, Kasey Kathan, Ellen Parr Doering

Agenda: Discuss suggested changes to the Groundwater Protection Rule and Strategy proposed by the Subcommittee of the GWCC.

The committee walked thru the draft rule section by section and the following additional comments were provided:

1. §12-103 should be Indirect Discharge Rules.
2. §12-301(b)(3) should read: groundwater withdrawal for farming that is in compliance with 6 V.S.A. chapter 215
 - a. Groundwater withdrawal for farming should qualify as a protected public trust if it is in compliance with BMPs/Required Agricultural Practices.
3. §12-303(a) “requirements of this subchapter”
 - a. Should read – requirement of 1-4 of this subsection, or have ‘and’ inserted at the end of 1-4.
4. §12-801(9) – for reclassification back to Class III, need to make it clearer that old information submitted for the Class IV reclassification may be utilized for this process and that all information may not be necessary. There is no need to put undue burden on this process collecting unnecessary information. **Rodney Pingree will look at revising this section to reflect the info needed.**
5. §12-901 - may want to consider the MCLG concept from the Water Supply Rules (6.15) in this context, the use of an enforcement standard *goal* may help with dealing with aspects of technical infeasibility.
6. Appendix A
 - a. Trimethylbenzenes – 1,2,4 and 1,3,5 had interim standards issued in 2007 of a total for both at 350 µg/l , this hasn’t been reflected in the revised GWPRS. Also the addition of 1,2,3 should be further considered or removed. It is not reported in method 8260. The 2/26/07 memo from Chuck Schwer was referenced along with the Interim Groundwater Quality Standard Guidance (on line table).
 - b. VAL column needs units (µg/l)
 - c. Secondary standards should match primaries for units, currently in mg/l, should be µg/l.

If Appendix B (Class IV reclassification procedure) is going to be included, the existing procedures for Class I and Class II reclassification should be modified and included as Appendices as well. **Rodney Pingree is working on redrafting this.**