

Informal Summary of Major Changes to the 2005 Water Supply Rule

This is an unofficial list of *major* changes. Additional minor changes have been made to the Rule which may not be reflected in this list. This list may include errors or omissions. You are advised to refer to the actual text of the April 2005 Rule to understand the regulations currently in effect.

WSR Section Name	WSR Section Number	Topic	Change
	Throughout the Rule	Federal Register	The federal register was removed as an Appendix to the Rule. It is now incorporated by reference.
	Throughout the Rule	Bottled Water	Each section and subchapter intro now more clearly notes whether the section is applicable to Domestic Bottled Water Systems (those with sources in Vermont) or Imported Bottled Water Systems (those outside Vermont).
Definitions	21-2.2	Bottled Water	Clarified definitions relating to bottled water systems.
Definitions	21-2.2	Cross Connections	Clarified the definition of a cross-connection to match with US EPA Guidance Document.
Definitions	21-2.2	Emergency Source	Clarified the definition of an emergency source
Definitions	21-2.2	Radionuclides	Added definition for Gross Beta Activity, and Man-made beta particle and photon emitters.
Definitions	21-2.2	Monitoring Wells	Added definition.
Definitions	21-2.2	Owners	Added definition and provided for the designation of an authorized representative
Definitions	21-2.2	Responsible Person	Deleted definition.
Definitions	21-2.2	Shallow Wells	Deleted definition.
Definitions	21-2.2	Small Scale Water System	Deleted definition and the term in the Rule. The term has been replaced with the specific type of water system.
Definitions	21-2.2	Virus	Added federal definition.
Definitions	21-2.2	Well	Clarified definition.
Permits Administration	21-3.0	Emergency Source	Clarified when and how an emergency source of water can be used.
Source and Construction Permits	21-3.1	Construction Permits	Clarified that construction permits are required for treatment at Public Transient Non-community Water Systems.
Source and Construction Permits	21-4.1	Source Permits	Clarified that Source Permits are required for hydrofracturing and deepening of sources.
Operating Permits	21-5.3	Operating Permits	Added that the owner of the water system must be the applicant for an operating permit.
Operating Permits	21-5.3	Operating Permits	Added a requirement that payment of fees can be a permit condition.
Drinking Water Quality	21-6.1	Analyses	Removed the option of analyses being conducted at a laboratory "acceptable to the Secretary."

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Requirements			Also, provided an alternative for Imported Bottled Water Systems to use laboratories that are not directly approved by Vermont.
Drinking Water Quality Requirements	21-6.1	Source Testing	Clarified the source water quality monitoring requirements.
Drinking Water Quality Requirements	21-6.6	Seasonal Systems	Added requirement for systems that are open seasonally to conduct a coliform test prior to start-up.
Drinking Water Quality Requirements	21-6.11	Filter Backwash	Added federal reference (40 CFR Part 141 Subpart H) to comply with Filter Backwash regulatory requirements.
Drinking Water Quality Requirements	21-6.10 and Table 6-1	Radionuclides	Updated radionuclide standards to match with federal requirements.
Drinking Water Quality Requirements	21-6.13	Secondary Standards	Clarified initial source water quality monitoring for secondary contaminants.
Drinking Water Quality Requirements	21-6.13 & 6.15	Small Scale Systems	Removed Water Quality Monitoring Requirements from main body of the rule, revised them in the Appendix.
Facility and Operation Requirements	21-7.1	Operation and Maintenance Manual	Added requirement for Non-transient Non-community Systems to an Operation and Maintenance Manual.
Facility and Operation Requirements	21-7.1	Storage Tanks	Clarified that the inspection of the outside of buried tanks may be limited to the exposed portions.
Facility and Operation Requirements	21-7.2	Disinfection	Added requirement of Non-transient Non-community System to have the capability of continuous disinfection.
Facility and Operation Requirements	21-7.9	Composite Correction Program	Added federal language that allows the Secretary to require a system to conduct a Composite Correction Program and to implement any follow-up recommendations.
Cross Connection	21-8	Cross Connections	Changed language to allow public water systems, instead of the Secretary to eliminate cross connections.
Reporting and Record Keeping	21-9.1	Reporting test results	Inserted federal language regarding the length of reporting results which is typically 10 days following the end of the monitoring period. Eliminated language that allowed for other lengths of reporting.
Reporting	21-9.1	Monthly reports	Added that the report may be for the amount of

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Requirements and Record Keeping			water purchased, instead of just produced.
Reporting Requirements and Record Keeping	21-9.1	Vandalism/Break-ins/Threats	Added requirement for water supplier to notify local law enforcement and the Secretary immediately when they discover a threat to water quality or quantity due to tampering, vandalisms, threats, or sabotage.
Reporting Requirements and Record Keeping	21-9.1	Transient System Annual Report	Added requirement for Transient Non-community systems to report annually to the Secretary on administrative and operational information.
Public Notification	21-10.1	Temporary Operating Permits	Clarified public notice requirements relating to Temporary Operating Permits.
Bottled & Bulk Water	21-11 Intro and 11.2	Bulk Water	Added language on bulk water intended for human consumption requirements
Bottled & Bulk Water	21-11.1.2	Bottled Water	Added in statutory language on equivalent regulations for imported water.
Bottled & Bulk Water	21-11.1.2	Bottled Water	Updated, added, condensed, and clarified updated bottled water permit application requirements.
Bottled & Bulk Water	21-11.1.2	Bottled Water	Change Radionuclide monitoring frequency from every 4 year to every 3 years.
Bottled & Bulk Water	21-11.1.2	Bottled Water	Removed “acceptable laboratory” language.
Bottled & Bulk Water	21-11.1.2	Bottled Water Labels	Removed the requirement to include date of bottling on label.
Bottled & Bulk Water	21-11.1.2	Bottled Water	Added a requirement for domestic Bottled Water Systems to operate in accordance with and approve Operation and Maintenance Manual.
Water System Classification and Operator Certification	21-12.2	Owner/Operator Responsibilities	Require that an owner and operator shall designate in writing who the operator is.
Water System Classification and Operator Certification	21-12.2	Operator Duties	Clarified the operator duties for visual inspections; added requirement to comply with applicable regulations and use of reasonable care and judgment in carrying out duties.
Water System Classification and Operator Certification	21-12.4	Certification Revocation	Added language to require Secretary to identify what steps may be taken to rep0ally for certification after revocation.
Water System	21-12.6	Operator in	Removed the requirement to have 3 months of in

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Classification and Operator Certification		Training	plant training experience to become an OIT.
System Classification and Operator Certification	21-21.8 and 12.9	Classification	Added a new class of systems/operators for Transient Non-community systems using disinfection or UV and included a continuing education requirement.
Laboratory Certification	21-13.1 and 13.2	Laboratory Certification	Removed Secretary's ability to find laboratories acceptable.
Source Water Protection	21-16	Domestic Bottled Water	Included requirement for Domestic Bottled Water Systems to have an approved Source Protection Plan
Source Water Protection	21-16.5	Sewer Lines in Source Protection Areas	Added language regulating sewer lines construction standards in source protection areas when the same entity owns both the water system and sewer lines.
Submission of Plans	Appendix A Part 1.1	Permit Applicant	Added requirement for owners to sign permit application.
Submission of Plans	Appendix A Part 1.2	Fire Flow Requirements	Updated language to reflect the "recommendations" not the "requirements" of the Insurance Services Office.
Public Water System Source Development and Protection	Appendix A Part 3.0	Source Development and Redevelopment	Noted that not all parts may be applicable for a pre-existing source.
Public Water System Source Development and Protection	Appendix A Part 3.3	Observation Well Testing	Changed the hours of monitoring observations wells.
Public Water System Source Development and Protection	Appendix A Part 3.3	Water Quality Testing	Clarified the initial source water testing parameters.
Public Water System Source Development and Protection	Appendix A Part 3.3	Unacceptable Source Interference	Added definition on reliable long term yield.
Water Supply Treatment	Appendix A Part 4.0	Best Available Technology	Require the use of Best Available Technology (BAT) when treatment is required under federal regulations.

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Finished Water Storage	Appendix A Part 7.0	Fire Protection Sizing	Changed minimum fire flow requirements.
Finished Water Storage	Appendix Part 7.0	Below Grade Reservoirs	Added requirement to cover below grade reservoirs with a flexible waterproof membrane.
Distribution Systems	Appendix A Part 8.1	Fire Protection Sizing	Changed language to be consistent with Appendix A Part 7.0.
Distribution Systems	Appendix A Part 8.9	Booster Pumps	Allowed for method to approve booster pumps on individual service pumps.
Non-Community and Non-Public Water Systems	Appendix A Part 11	Throughout	Removed the term “Small-scale System” and inserted more accurate terms.
Non-Community and Non-Public Water Systems	Appendix A Part 11.7	Water Quality Testing	Changed initial source water quality testing requirements to include Nitrite and Uranium