



March 31, 2025

To: Chair Amy Sheldon and Members of the House Committee on Environment  
From: Jared Carpenter, Lake Champlain Committee  
Re: Proposed Chloride Monitoring Language for H.86

Below is proposed language to address monitoring for chloride discharge coming from a point source. This incorporates the changes proposed by ANR but also requires monitoring at the point of discharge where chloride contamination is occurring from a single identifiable source, rather than downstream in a "mixing zone." This is not intended to address monitoring for diffuse chloride sources but rather from single identifiable discharge points so the source of the discharge can be more readily addressed.

Thank you for the consideration.

### **Proposed Changes to Monitoring Language**

When a State water or water segment is identified as ~~contaminated~~ impaired by due to chloride levels that exceed the chronic or acute standards established in the Vermont Water Quality Standards by the U.S. Environmental Protection Agency (EPA), the Secretary of Natural Resources shall conduct analyses and monitoring as necessary to characterize the level of impairment and assess significant sources in the contributing watershed for the development of an EPA approved Total Maximum Daily Load (TMDL). In circumstances when a chloride discharge to waters is occurring from a single identifiable source, the Secretary shall monitor for compliance at the point of discharge to a water or wetland of the State. ~~begin regular monitoring of the chloride levels in that water or water segment and investigate potential acute and diffuse contamination sources, such as impervious surfaces. If the source that is causing chloride contamination levels that exceed EPA chronic or acute standards is found, the Secretary of Natural Resources shall require monitoring at the physical discharge point into a water of the State or into a hydrological connection to a water of the State.~~

### **Proposed ANR changes to S.29 v3.2**

When a State water or water segment is identified as ~~contaminated~~ impaired by due to chloride levels that exceed the chronic or acute standards established in the Vermont Water Quality Standards by the U.S. Environmental Protection Agency (EPA), the Secretary of Natural Resources shall conduct analyses and monitoring as necessary to characterize the level of impairment and assess significant sources in the contributing watershed for the development of an EPA approved Total Maximum Daily Load (TMDL) ~~begin regular monitoring of the chloride levels in that water or water segment and investigate potential acute and diffuse contamination sources, such as impervious surfaces. If the source that is causing chloride contamination levels that exceed EPA chronic or acute standards is found, the Secretary of Natural Resources shall require monitoring at the physical discharge point into a water of the State or into a hydrological connection to a water of the State.~~

## **H.86 As Introduced**

### **ANR ENHANCED MONITORING OF CHLORIDE LEVELS IN SURFACE WATERS**

When a State water or water segment is identified as contaminated by chloride levels that exceed the chronic or acute standards established by the U.S. Environmental Protection Agency (EPA), the Secretary of Natural Resources shall begin regular monitoring of the chloride levels in that water or water segment and investigate potential acute and diffuse contamination sources, such as impervious surfaces. If the source that is causing chloride contamination levels that exceed EPA chronic or acute standards is found, the Secretary of Natural Resources shall require monitoring at the physical discharge point into a water of the State or into a hydrological connection to a water of the State.