From: Jon Hill jon@greenstoneslate.com
Subject: 3AIS concerns
Date: Feb 16, 2025 at 11:19:27 AM
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Good day,

Today, I am writing to you to inform you that I plan on attending Tuesday's 3 Acres Impervious Soil zoom meeting. I value this meeting and have a two questions regarding water quality, one on the physical demands that the 3AIS will place on my facility, and finally one regarding water volume.

Water Quality:

First I would like to give you a short history lesson on my
slate quarry in Poultney, Vermont. My property is deemed to be non-compliant with the 3AIS law. I have applied for a permit and I have hired an engineer, and Patrick Griffen of Enman-Kesselring has presented me with a plan to make my location compliant.

The plan includes developing a man-made gravel field

and wetland field as required by the 2017 VT Stormwater Management Manual. I know that the newly engineered plan will definitely work because we already have one. The current man made gravel system that was inadvertently built from the quarry extraction has been in place and is working for over 75 years.

Slate is a truly unique product. The extraction and production processes require no chemicals and very little diesel to power our facilities. It does require electricity, human power, water and alot of physically space to produce the finished roofing slate tile.

The uniqueness of our South Poultney operation, is that our 15 acre production facility site is located on a 185 acres parcel. It has very little surface soil but the facility is perched upon 40-80 feet of extraction tailings. These tailings have been continuously removed and placed next to the original 1890's quarry since its inception. Since the minerals are precious

and the land is finite, the tailings have been placed layer upon layer over the duration of the extraction. Over 100 years ago, without any forethought, the original quarry operators started side casting slate rubble into a deep ravine and inadvertently created their own subterranean gravel field. A term I was unfamiliar with until I was informed by ANR members Padriac Monk and Terry Purcell, who were invited to our facility to provide some insight from the site visit.

What is even more remarkable was the unintentional conversation of a huge wet land to south of our facility. This denuded area was once a peat field, where until the 1890's the owner cut and sold peat for fuel. At this time, a local slate baron with international ties identified the existence of slate on the property and bought the minerals with its peat field. Since his purchase objective was for the slate only, the peat harvesting was mothballed. Without these unintentional series of events, the peat would have been extracted and burned. Again without any

forethought, we are facility is seated in a stone bowl filled with crushed slate with a natural leach field.

No mention of water impurity's associated with our facility were ever discussed until 2014 when I was invited with a group of slate producers to an ANR meeting. At this meeting I was blindsided by erroneous accusations, and I was the only operation to by called out by name in front of ANR, CLF and VCE and numerous politicians.

After this meeting, I was approached by Rep. Leeland Morgan and he explained and I realized that I needed to better prepare myself for these issues in the future. He explained that regardless of the truth, the memory is ingrained. Immediately, I took his advice and set up a water testing program through Endyne to assure myself and others that I am not a polluter. After a long investigation, I was exonerated by the Army Corps of Engineers.

I still test for petrochemicals, suspended solids and now phosphorus. I have test evidence that my facility has better water quality leaving the facility than when it enters my property. I am subject to the belief that this is caused by the unintentional creation of the historical existing gravel field and its natural cleaning effects associated with the natural leach/peat field.

Concern#1: My question is why am I forced to dig up an existing system to replace with a slightly modified similar system?

Concern#2: I was informed that under the 3AIS law, I can not test out of the requirement to build a new gravel wastewater treatment field because the test results were never set. If this is this is true, (and it would seem counterintuitive) and water quality is the main concern then why was a series of levels never established?

Physical Demands:

Our quarry has been operated under numerous different owners since 1875, we have continuously operated it since my grandfather bought it in 1955. However, the extraction techniques have seen very little change and therefore it's extraction is costly.

Greenstone has been successful because we are extremely frugal and do not squander our natural resources. We pride ourselves on using every piece of raw slate that is available. Often times, this means that we are producing non-commercial standard slates or by-products of the original order. This by-product requires that we inventory a large amount of our production. For example, we have pallets of finished but unsold slate that have been accumulated for over 15 years.

Vermont slate has been sold in every dimension and thickness imaginable. Our current sales are based on the past. Repairing, replacing or matching the myriad

of Vermont slates that were installed over the past 100-150 years is the upmost importance to our business. Therefore, we save every slate formate we make. This allows us to conserve our resources while continuing to provide a product in a timely manner that historical structures require, and new projects will want. However, this costs both money and more importantly space. To conserve our unordered slate, we are using a tremendous amount of uncovered storage ground.

Our physical building space is short of 2 acres,however, the storage area deemed impervious soil is nearly 15 acres. It is all slate in various different stages of completion sitting on 60 feet of unpaved slate.

When we implement Enman-Kesselring's plan we will be unable to utilize our entire lower unpaved parking that we load trucks for shipment. This will mean that we will have to find another area to stage our finished

and semi finished slate products but I can increase the sites footprint. Therefore, due to increased costs I foresee having to change my office staff and shipping location to my quarry location in Middle Granville, NY. I do not want this to occur but I need to be compliant.

Concern#3:
Moving the finished goods nearly 8 miles to NY will drastically change our approach to being efficient and frugal with our less than fast moving inventory. I may have to forgo conservation for space? The E-K plan does not allow me to keep the status quo. Which is more important, mineral conservation or reducing my nearly nonexistent phosphorus levels to an even lower but probably unobtainable level?

Water Volume Issues:

So why the elaborate history lesson, the truth is that outside the industry really no one understands what the Vermont Slate industry does. It is such a shrinking

niche that it is often forgotten.

My facility is always in fluctuation. It is literally expanding vertically by physically placing layer upon layer. The creation of a new 3AIS approved gravel field may cause water control and directional problems for my facility. The cutting of slate is very water dependent for its production. Since we do not use drilled wells but rather recycle the rain water back in to three existing massive historic quarries, allowing the sediment to naturally settle before using it to cool our saw blades. We have been using this same procedure of recycling the water and therefore we are weary of change.

I have a 75 year history of successfully keeping the slate silt off my neighbors lands. Slate does not contain phosphorus. I have a 10 year Endyne test procedure and proven results to further secure my neighbors from any impurities from leaching onto their property. Since that infamous day in Montpelier, I have

been very committed and proactive in mitigating our water run off.

The plan presented by Enman-Kesselring Engineering will qualify us to be compliant with the 3AIS Law. It is an approved, logical watershed control design to make the average asphalt parking lot compliant under the very rigid VT Stormwater Management Manual.

I respect what the State of Vermont is trying to accomplish regarding phosphorus load reduction and I will implement this E-K procedure if needed. However, our quarries/facilities are very unique as we do not want the water to disperse off the property but need it replenished our internal reservoirs.

<u>Concern#4:</u>
If this plan does not succeed in reducing the phosphorus run off from my facility but does reduce my volume of reusable recycled water, how will I be compensated for my losses?

I would like to thank you both for offering this opportunity to express my concerns. I look forward to attending the zoom meeting Tuesday.

Sincerely,
Jonathan Hill

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Sent from my iPhone