Conservation Law Foundation
15 East State Street, Suite 4
Montpelier, VT 05602

Vermont Natural Resources Council
9 Bailey Avenue
Montpelier, VT 05602

October 16, 2025

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Vorsteveld Farm, LLP
4531 Jersey Street
Panton, VT 05491

Vorsteveld Farm, LLP
1341 Arnold Bay Road
Panton, VT 05491

Hans Vorsteveld
Registered Agent, Partner, and Owner
1341 Arnold Bay Road
Panton, VT 05491
hansv@gmavt.net

Re: Notice of Intent to Sue for Violations of the Clean Water Act

To Whom It May Concern:

Vorsteveld Farm, LLP is discharging pesticides—including atrazine, metolachlor, clothianidin, and thiamethoxam—and other pollutants directly into Dead Creek, a water of the United States located in Panton, Vermont, from numerous pipes without a National Pollutant Discharge Elimination System ("NPDES") permit in violation of the federal Clean Water Act ("CWA"), 33 U.S.C. §§ 1311(a) and 1342.

Accordingly, Conservation Law Foundation ("CLF") and Vermont Natural Resources Council ("VNRC") hereby give notice of their intent to file suit pursuant to 33 U.S.C. § 1365(a) and (f) against Vorsteveld Farm, LLP ("Vorsteveld"). This Notice Letter serves as notice pursuant to 33 U.S.C. § 1365(b)(1)(A) and 40 C.F.R. pt. 135.

Dead Creek is a tributary of Lower Otter Creek and Lake Champlain. Vorsteveld's unpermitted discharges adversely affect all three waters and the ecosystems that they support. CLF's and VNRC's members who live, work, and recreate nearby and who regularly use and enjoy Dead Creek, Lower Otter Creek, and Lake Champlain are negatively impacted by the Vorsteveld's discharges.

CLF and VNRC's notice seeks to bring Vorsteveld into compliance with the CWA and to prevent further degradation of Vermont's waters by pesticides and other pollutants.

Fig. 1. The SF-7 outfall pipe on Vorsteveld Farm, LLP discharging pollutants directly into Dead Creek.

BACKGROUND

Vorsteveld Farm, LLP is a large concentrated animal feeding operation ("CAFO").[1] Vorsteveld manages a dairy herd equivalent to 2,892 animal units and primarily grows silage corn, soy, and grass hay on 2841.1 acres of cropland.[2]

Vorsteveld uses a suite of pesticides to manage its land and crops, including atrazine, metolachlor, clothianidin, and thiamethoxam. These pesticides are harmful to human health and the environment. Atrazine affects human cardiovascular and reproductive health.[3] Metolachlor is a Group C possible human carcinogen.[4] Clothianidin and thiamethoxam are potent insecticides,

[1] 40 C.F.R. § 122.23(b)(4) (defining "large concentrated animal feeding operation").
[2] Vorsteveld Farm, LLP, NUTRIENT MANAGEMENT PLAN UPDATE 2025, at 9, 29 (Feb. 10, 2025) [hereinafter "2025 VORSTEVELD NMP"].
[3] *National Primary Drinking Water Regulations*, EPA, https://www.epa.gov/ground-water-and-drinking-water/national-primary-drinking-water-regulations (last visited Oct. 12, 2025).
[4] S-metolachlor; Pesticide Tolerance, 71 Fed. Reg. 51505, 51507 (Aug 30, 2006).

spread rapidly through the environment,[5] and are known to devastate pollinator populations and aquatic ecosystems.[6]

Vorsteveld's dairy herd produces tens of millions of gallons of manure annually,[7] more sanitary waste than the City of Burlington.[8] Vorsteveld stores the manure in massive cesspools often described as "lagoons." It injects, spreads, and sprays the untreated manure on its land both to dispose of the manure and to fertilize its crops. Vorsteveld also applies synthetic fertilizer to its land.

Vorsteveld uses a range of heavy machinery to apply pesticides, manure, and fertilizer. These include boom sprayers; See and Spray™ sprayers; seed drills; manure spreaders; and liquid manure injectors. It also uses extensive engineered subsurface drainage pipe networks installed beneath its cropland. Outfall pipes that emerge from these networks discharge into Dead Creek and other waters.

LEGAL FRAMEWORK

Congress enacted the CWA "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters."[9]

The CWA prohibits "any person"—including any individual, corporation, partnership, or association[10]—from discharging "any pollutant" from "any point source" unless authorized by a NPDES permit.[11] A discharge occurs whenever a pollutant is added to a navigable water from a point source.[12] A point source does not need to be the original source of the pollutant discharged for a violation of the CWA to occur. Instead, the point source "need only convey the pollutant"

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[5] Christian H. Krupke & John F. Tooker, *Beyond the Headlines: The Influence of Insurance Pest Management on an Unseen, Silent Entomological Majority*, 4 FRONTIERS IN SUSTAINABLE FOOD SYS. 595855 (2020), https://doi.org/10.3389/fsufs.2020.595855.

[6] *See, generally*, Travis A. Grout et al., NEONICOTINOID INSECTICIDES IN NEW YORK STATE at 22–24 (2020), https://cornell.app.box.com/v/2020-neonicotinoid-report [hereinafter "2020 CORNELL NEONICOTINOID REPORT"]; EPA, EPA-HQ-OPP-2011-0865-0242, PRELIMINARY AQUATIC AND NON-POLLINATOR TERRESTRIAL RISK ASSESSMENT TO SUPPORT THE REGISTRATION REVIEW OF CLOTHIANIDIN at 23 (2017), https://www.regulations.gov/document/EPA-HQ-OPP-2011-0865-0242 [hereinafter "2017 EPA CLOTHIANIDIN RISK ASSESSMENT"]; EPA, EPA-HQ-OPP-2011-0581-0093, PRELIMINARY RISK ASSESSMENT TO SUPPORT THE REGISTRATION REVIEW OF THIAMETHOXAM at 24 (2017), https://www.regulations.gov/document/EPA-HQ-OPP-2011-0581-0093 [hereinafter "2017 EPA THIAMETHOXAM RISK ASSESSMENT"].

[7] 2025 Vorsteveld NMP, *supra* note 2, at 11.

[8] *See* Michael Van Amburgh and Karl Czymmek, *Series: Phosphorus and the Environment, 2. Setting the Record Straight: Comparing Bodily Waste Between Dairy Cows and People*, CORNELL FIELD CROPS (June 21, 2017), https://blogs.cornell.edu/whatscroppingup/2017/06/21/series-phosphorus-and-the-environment-2-setting-the-record-straight-comparing-bodily-waste-between-dairy-cows-and-people/.

[9] 33 U.S.C. § 1251(a).

[10] *Id.* § 1342(5).

[11] *Id.* § 1251(a).

[12] *Id.* § 1362(12) (defining "discharge of a pollutant" as "any addition of any pollutant to navigable waters from any point source").

to a navigable water of the United States.[13] Unpermitted discharges violate the CWA regardless of their magnitude.[14]

The CWA defines "point source" broadly as "any discernible, confined and discrete conveyance, including but not limited to any *pipe*, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, [or] concentrated animal feeding operation . . . from which pollutants are or may be discharged. . . ."[15] An outfall pipe discharging pollutants directly into a jurisdictional waterbody is a prototypical point source.

Fig. 2. The P-2 outfall pipe on Vorsteveld Farm, LLP discharging pollutants into Dead Creek.

The CWA defines "pollutant" in similarly broad terms.[16] Agricultural waste, chemical waste, biological waste, and sewage are pollutants within the meaning of the CWA.[17] Pesticide residues are agricultural and chemical wastes subject to regulation under the CWA.[18]

The CWA authorizes citizens to sue any person alleged to be in violation of an effluent standard or limitation.[19] Vorsteveld is in violation of an effluent standard or limitation because it is

[13] *S. Fla. Water Mgmt. Dist. v. Miccosukee Tribe of Indians*, 541 U.S. 95, 105 (2004).
[14] *See, e.g.*, *San Francisco Baykeeper v. City of Sunnyvale*, 627 F. Supp. 3d 1102, 1108 (N.D. Cal. 2022) ("Good faith, impossibility, ignorance, and de minimus discharges are no defense to a violation.").
[15] 33 U.S.C. § 1362(14) (emphasis added).
[16] *Id*.
[17] *Id.* § 1362(6).
[18] *Nat'l Cotton Council of Am. v. U.S. E.P.A.*, 553 F.3d 927, 936–37 (6th Cir. 2009); *see* 40 C.F.R. § 122.2 (defining "pesticide residue").
[19] 33 U.S.C. § 1365(a), (b), (f); 40 C.F.R. § 135.2.

discharging pesticides and other pollutants from pipes directly to Dead Creek without a NPDES permit.

Fig. 3. The CF-3 outfall pipe on Vorsteveld Farm, LLP discharging pollutants directly into Dead Creek.

PERSONS RESPONSIBLE FOR ALLEGED VIOLATIONS

Vorsteveld Farm, LLP is the person, as defined by 33 U.S.C. § 1362(5), responsible for the violations alleged in this Notice Letter.[20]

LOCATION OF THE ALLEGED VIOLATIONS

Vorsteveld Farm, LLP's principal office address is 4531 Jersey Street, Panton, Vermont. Vorsteveld manages three production sites at the following addresses: 4531 Jersey Street, Panton, Vermont; 2066 Arnold Bay Road, Panton, Vermont; and 1033 Adams Ferry Road, Panton, Vermont.

The alleged violations occurred and continue to occur at the locations described below. This Notice Letter uses the field names found in Vorsteveld's 2025 nutrient management plan.[21]

[20] 33 U.S.C. § 1362(5) (defining "person" to include any "individual, corporation, partnership, [or] association . . . .").
[21] 2025 Vorsteveld NMP, *supra* note 2.

South of Hedge Field's Outfall Pipes
At South of Hedge Field—identified separately as "Below Andre Field" and "Through Hedge Field" by Vorsteveld's nutrient management plans before 2025[22]—Vorsteveld discharges pollutants from several outfall pipes into Dead Creek. South of Hedge Field extends south from South Road-LT-1 and spans from Dead Creek's western bank to Jersey Street. South of Hedge Field's "LT-1" outfall pipe is located within the public right of way on the northern side of South Road-LT-1 at approximately 44°07'42"N 73°20'02"W. LT-1 discharges into Dead Creek.

Pump and Gully Field's Outfall Pipes
At Pump and Gully Field—identified separately as "Pump Field" and "Gully Field" by Vorsteveld's nutrient management plans before 2025[23]—Vorsteveld discharges pollutants from multiple outfall pipes into a wetland on the western side of Dead Creek. Pump and Gully Field is located north of South Road-LT-1 and borders Dead Creek's western bank. Pump and Gully Field's "P-2" outfall pipe is located on Dead Creek's western bank at approximately 44°08'09"N 73°19'53"W. P-2 discharges into Dead Creek.

South Flats Field's Outfall Pipes
At South Flats Field, Vorsteveld discharges pollutants from multiple outfall pipes into Dead Creek. South Flats Field extends south from Panton Road and west from Dead Creek's western bank. South Flats Field's "SF-6" and "SF-7" outfall pipes are located on Dead Creek's western bank. SF-6 is located at approximately 44°08'43.96"N 73°19'41.97"W. SF-7 is located at approximately 44°08'41"N 73°19'40"W. SF-6 and SF-7 discharge directly into Dead Creek.

Newtons Mother Field's Outfall Pipes
At Newtons Mother Field, Vorsteveld discharges pollutants from multiple outfall pipes into Dead Creek. Newtons Mother Field extends north from Panton Road and east from Dead Creek. Newtons Mother Field's "NM-1" and NM-3" outfall pipes are located on Dead Creek's eastern bank. NM-1 is located at approximately 44°09'5.16"N 73° 19'10.85"W. NM-3 is located at approximately 44°09'21.69"N 73°19'0.18"W. NM-1 and NM-3 discharge directly into Dead Creek.

North of Panels Field's Outfall Pipes
At North of Panels Field—identified as "Creek Field" by Vorsteveld's nutrient management plans before 2025[24]—Vorsteveld discharges pollutants from multiple outfall pipes into Dead Creek. North of Panels Field is located north of Panton Road and extends west from Dead Creek. North of Panels Field shares a border with Solar Panels Field. North of Panels Field's "CF-2," "CF-3," "CF-4A," "CF-5A," and "CF-5B" outfall pipes are located on Dead Creek's western bank. CF-2 is located at approximately 44°09'28"N 73°19'11"W. CF-3 is located at approximately 44°09'35"N 73°19'10"W. CF-4A is located at approximately 44°09'44"N 73°19'11"W. CF-5A is located at approximately 44°09'51"N 73°19'14"W. CF-5B is located at

[22] *See, e.g.*, Vorsteveld Farm, LLP, NUTRIENT MANAGEMENT PLAN UPDATE 2024 (Feb. 13, 2024)
[23] *Id.*
[24] *Id.*

approximately 44°09'51"N 73°19'14"W. CF-2, CF-3, CF-4A, CF-5A, and CF-5B discharge directly into Dead Creek.

ACTIVITIES ALLEGED TO VIOLATE THE CLEAN WATER ACT

Based on effluent monitoring data, Vorsteveld has discharged and continues to discharge pesticides and other pollutants directly into Dead Creak from outfall pipes on South of Hedge Field, Pump and Gully Field, South Flats Field, Newtons Mother Field, and North of Panels Field. These outfall pipes include LT-1, P-2, SF-6, SF-7, NM-1, NM-3, CF-2, CF-3, CF-4A, CF-5A, and CF-5B. All of these pipes are point sources.

Vorsteveld discharges a range of pollutants through the outfall pipes, including the following:

- Atrazine;
- Metolachlor;
- Clothianidin;
- Clothianidin urea;
- Clothianidin-n-desmethyl;
- Thiamethoxam;
- Thiamethoxam urea;
- Dinotefuran;
- Imidacloprid;
- Trifloxystrobin;
- Tebuconazole;
- Pyraclostrobin;
- Propiconazole;
- Flutriafol;
- Metalaxyl;
- Ipconazole;
- Azoxystrobin;
- Myclobutanil;
- Carbendazim;
- Phosphorus;
- Nitrogen;
- Nitrate;
- Biological oxygen demand; and
- Total suspended solids.

Vorsteveld discharges the pollutants directly into Dead Creek, a navigable water of the United States located in Panton, Vermont. Dead Creek is a tributary of Lower Otter Creek and Lake Champlain.

Fig. 4. The NM-1 outfall pipe on Vorsteveld Farm, LLP discharging pollutants directly into Dead Creek.

Vorsteveld's discharges are not authorized by a NPDES permit and therefore violate the CWA. The discharges are harmful and contain alarming concentrations of pollutants, including atrazine, metolachlor, clothianidin, and thiamethoxam.

Atrazine is an herbicide that agricultural operations often use to control grasses and broadleaf weeds in corn and other crops.[25] The European Union prohibited the agricultural use of atrazine in 2004, citing concerns related to groundwater contamination, health risks, and environmental impacts.[26] The U.S. Environmental Protection Agency ("EPA") recognizes that exposure to atrazine poses human health risks, including cardiovascular and reproductive problems.[27] EPA regulations consequently establish a maximum contaminant level ("MCL") for atrazine in drinking water of 3,000 ng/L.[28] Vorsteveld's unpermitted atrazine discharges reach concentrations of 164,000 ng/L, more than 54 times the MCL:

[25] *Atrazine*, EPA, https://www.epa.gov/ingredients-used-pesticide-products/atrazine (last visited Oct. 12, 2025).
[26] Commission Decision of 10 March 2004 Concerning the Non-inclusion of Atrazine in Annex I to Council Directive 91/414/EEC and the Withdrawal of Authorisations for Plant Protection Products Containing this Active Substance, 2004/248/EC, 2004 O.J. (L 78/53) 1–3.
[27] *National Primary Drinking Water Regulations*, *supra* note 3.
[28] 40 C.F.R. § 141.61(c)(1).

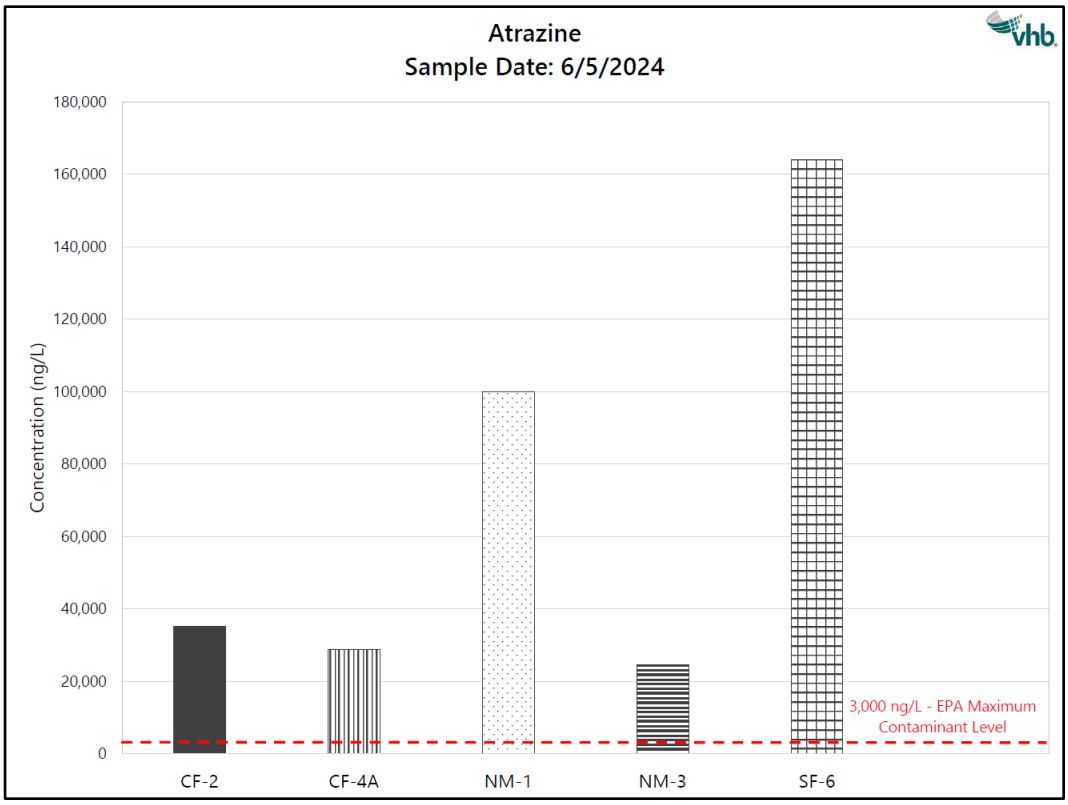

Fig. 5. Concentration of atrazine in effluent samples collected from CF-2, CF-4A, NM-1, NM-3, and SF-6 on June 5, 2024.

Metolachlor, like atrazine, is an herbicide. The European Union prohibited its agricultural use in 2023 based on concerns related to groundwater contamination and exposure.[29] EPA classifies metolachlor as a Group C possible human carcinogen.[30] Vermont has responded by establishing a groundwater enforcement standard of 70,000 ng/L.[31] Vorsteveld's unpermitted metolachlor discharges have exceeded that standard by up to 48,000 ng/L.

Clothianidin is an insecticide and neonicotinoid that is most often used as a seed treatment in corn.[32] Large-scale studies and reports have concluded that insecticidal seed treatments are unnecessary and that their elimination offers farmers an opportunity to save costs.[33] The

[29] Commission Implementing Regulation 2024/20 of Dec. 12, 2023, Concerning the Non-renewal of the Approval of the Active Substance S-metolachlor, in Accordance with Regulation (EC) No 1107/2009 of the European Parliament and of the Council, and Amending Commission Implementing Regulation (EU) No 540/2011, 2023 O.J. (L 3.1.2024) 1–4.
[30] S-metolachlor; Pesticide Tolerance, 71 Fed. Reg. 51505, 51507 (Aug 30, 2006).
[31] 16-12 VT. CODE R. app. 1.
[32] 2017 EPA CLOTHIANIDIN RISK ASSESSMENT, *supra* note 6.
[33] E.g., 2020 CORNELL NEONICOTINOID REPORT, *supra* note 6, at 234–36 (basing its conclusions on a review of 82 studies of neonicotinoid efficacy in corn and 176 studies of neonicotinoid efficacy in soybean); Geneviève Labrie et al., *Impacts of neonicotinoid seed treatments on soil-dwelling pest populations and agronomic parameters in corn and soybean in Quebec (Canada)*, PLOS ONE (2020), https://doi.org/10.1371/

European Union prohibited the outdoor use of seeds treated with clothianidin in 2018 to protect pollinators.[34] EPA recognizes that clothianidin poses significant risks to aquatic ecosystems. It consequently established a freshwater aquatic invertebrate chronic toxicity benchmark of 50 ng/L and a freshwater aquatic invertebrate acute toxicity benchmark of 11,000 ng/L.[35] Vorsteveld's unpermitted clothianidin discharges routinely exceed the chronic toxicity benchmark and have exceeded the acute toxicity benchmark by up to 7,680 ng/L:

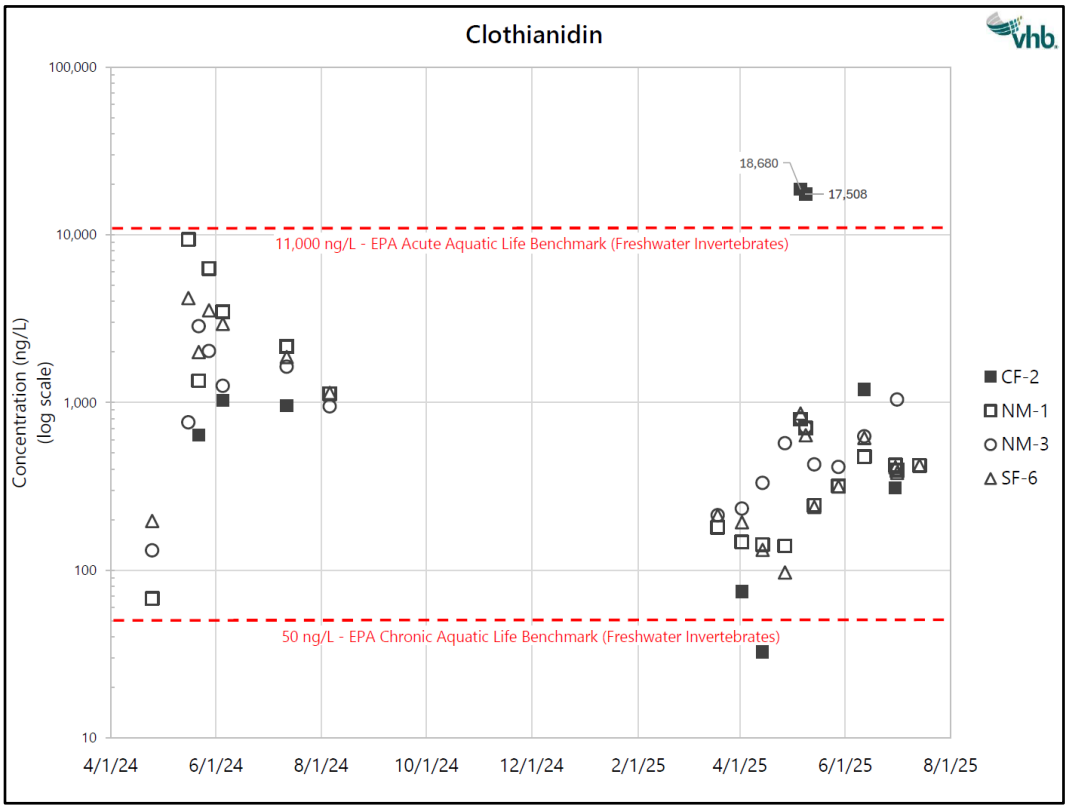

Fig. 6. Concentration of clothianidin in effluent samples collected from CF-2, NM-1, NM-3, and SF-6 between April 25, 2024 and July 14, 2025.

Much like clothianidin, thiamethoxam is an insecticide and neonicotinoid often used as a seed treatment, particularly in corn and soy.[36] The European Union prohibited the outdoor use of seeds treated with thiamethoxam in 2018 to protect pollinators.[37] Thiamethoxam seed treatments

journal.pone.0229136; Jocelyn L. Smith et al., *Quantifying Early-Season Pest Injury and Yield Protection of Insecticide Seed Treatments in Corn and Soybean Production in Ontario, Canada*, 113 J. OF ECON. ENTOMOLOGY 2197 (2020), https://doi.org/10.1093/jee/toaa132.

[34] Commission Implementing Regulation 2018/784 of May 29, 2018, Amending Implementing Regulation (EU) No 540/2011 as Regards to Conditions of Approval of the Active Substance Clothianidin, 2018 O.J. (L 132/35) 1–4.

[35] *Aquatic Life Benchmarks and Ecological Risk Assessments for Registered Pesticides*, EPA, https://www.epa.gov/pesticide-science-and-assessing-pesticide-risks/aquatic-life-benchmarks-and-ecological-risk (last visited Oct. 12, 2025).

[36] 2017 EPA THIAMETHOXAM RISK ASSESSMENT, *supra* note 6.

[37] Commission Implementing Regulation 2018/785 of May 29, 2018, Amending Implementing Regulation (EU) No

in corn and soy offer farms no economic benefit.[38] Thiamethoxam poses significant risks to aquatic ecosystems. EPA consequently established a freshwater aquatic invertebrate chronic toxicity benchmark of 740 ng/L.[39] Vorsteveld's unpermitted thiamethoxam discharges have reached concentrations of 10,205 ng/L, more than 13 times EPA's benchmark.

DATES OF THE VIOLATIONS

Vorsteveld has been in violation of the CWA since at least April 25, 2024. Each day that Vorsteveld discharges any pollutant from any outfall pipe into Dead Creek without a NPDES permit constitutes a separate and distinct violation of 33 U.S.C. §§ 1311(a) and 1342.

Vorsteveld discharged pollutants from LT-1 in violation of the CWA on at least the following dates: April 25, 2024; May 16, 2024; May 22, 2024; May 28, 2024; July 12, 2024; and April 2, 2025. The pollutants discharged on the foregoing dates are presented in Attachment A.

Vorsteveld discharged pollutants from P-2 in violation of the CWA on at least the following dates: April 14, 2025; May 6, 2025; May 9, 2025; May 14, 2025; May 28, 2025; and June 12, 2025. The pollutants discharged on the foregoing dates are presented in Attachment A.

Vorsteveld discharged pollutants from SF-6 in violation of the CWA on at least the following dates: April 25, 2024; May 16, 2024; May 22, 2024; May 28, 2024; June 5, 2024; July 12, 2024; August 6, 2024; March 19, 2025; April 2, 2025; April 14, 2025; April 27, 2025; May 6, 2025; May 9, 2025; May 14, 2025; May 28, 2025; June 12, 2025; June 30, 2025; July 1, 2025; and July 14, 2025. The pollutants discharged on the foregoing dates are presented in Attachment A.

Vorsteveld discharged pollutants from SF-7 in violation of the CWA on at least the following dates: March 19, 2025 and July 14, 2025. The pollutants discharged on the foregoing dates are presented in Attachment A.

Vorsteveld discharged pollutants from NM-1 in violation of the CWA on at least the following dates: April 25, 2024; May 16, 2024; May 22, 2024; May 28, 2024; June 5, 2024; July 12, 2024; August 6, 2024; March 19, 2025; April 2, 2025; April 14, 2025; April 27, 2025; May 6, 2025; May 9, 2025; May 14, 2025; May 28, 2025; June 12, 2025; June 30, 2025; July 1, 2025; and July 14, 2025. The pollutants discharged on the foregoing dates are presented in Attachment A.

Vorsteveld discharged pollutants from NM-3 in violation of the CWA on at least the following dates: April 25, 2024; May 16, 2024; May 22, 2024; May 28, 2024; June 5, 2024; July 12, 2024; August 6, 2024; March 19, 2025; April 2, 2025; April 14, 2025; April 27, 2025; May 6, 2025;

540/2011 as Regards the Conditions of Approval of the Active Substance Thiamethoxam, 2018 O.J. (L 132/40) 1–4.

[38] EPA, BENEFITS OF NEONICOTINOID SEED TREATMENTS TO SOYBEAN PRODUCTION, at 2 (2014), https://www.epa.gov/pollinator-protection/benefits-neonicotinoid-seed-treatments-soybean-production (concluding that "neonicotinoid seed treatments likely provide $0 in benefits . . . .").

[39] *Aquatic Life Benchmarks and Ecological Risk Assessments for Registered Pesticides*, *supra* note 35.

May 9, 2025; May 14, 2025; May 28, 2025; June 12, 2025; and July 1, 2025. The pollutants discharged on the foregoing dates are presented in Attachment A.

Vorsteveld discharged pollutants from CF-2 in violation of the CWA on at least the following dates: May 22, 2024; June 5, 2024; July 12, 2024; April 2, 2025; April 14, 2025; May 6, 2025; May 9, 2025; June 12, 2025; and June 30, 2025. The pollutants discharged on the foregoing dates are presented in Attachment A.

Vorsteveld discharged pollutants from CF-3 in violation of the CWA on at least the following date: August 6, 2024. The pollutants discharged on that date are presented in Attachment A.

Vorsteveld discharged pollutants from CF-4A in violation of the CWA on at least the following dates: May 16, 2024; May 22, 2024; May 28, 2024; June 5, 2024; July 12, 2024; August 6, 2024; March 19, 2025; June 30, 2025; and July 1, 2025. The pollutants discharged on the foregoing dates are presented in Attachment A.

Vorsteveld discharged pollutants from CF-5A in violation of the CWA on at least the following date: July 14, 2025. The pollutants discharged on that date are presented in Attachment A.

Vorsteveld discharged pollutants from CF-5B in violation of the CWA on at least the following dates: March 19, 2025; June 30, 2025; and July 1, 2025. The pollutants discharged on the foregoing dates are presented in Attachment A.

Vorsteveld's CWA violations are ongoing and continuous. Barring the issuance of a NPDES permit to Vorsteveld or changes in Vorsteveld's operations, infrastructure, management, or practices that result in full compliance with the CWA's permitting requirements, Vorsteveld's violations will continue indefinitely.

This Notice Letter encompasses any violations by Vorsteveld at the locations identified above, including violations that occur after the date of this Notice Letter.

PERSONS GIVING NOTICE

CLF is a not-for-profit 501(c)(3) member-supported organization dedicated to the conservation and protection of New England's environment. CLF has a long history of working to protect the health of New England's and Vermont's water resources, including addressing significant sources of pollution, including agricultural pollutant discharges. Within CLF, the Lake Champlain Lakekeeper® acts as the Lake's eyes and ears by patrolling the Champlain watershed in its vessels to guard against illegal pollution, monitor the Lake's health, and educate stakeholders. Ensuring that Lake Champlain and its surrounding natural spaces are fully protected under the CWA and other laws is a priority of the Lakekeeper. CLF has thousands of members across New England, including hundreds who reside in Vermont.

VNRC is a Vermont-based not-for-profit 501(c)(3) member-supported environmental advocacy

organization that has been addressing environmental issues in Vermont, including issues related to water quality, for 60 years. VNRC's mission is to protect and enhance Vermont's natural environments, vibrant communities, productive working landscapes, rural character, and unique sense of place through advocacy, collaboration, research, and education. VNRC serves as a watchdog of the state administration to ensure laws are implemented as intended through rulemaking and agency oversight. VRNC has over 5,000 members who reside across Vermont, including in Addison County and the Champlain Valley.

CLF's and VNRC's members use and enjoy Dead Creek, Lower Otter Creek, and Lake Champlain. These members include beekeepers, businesspeople, ornithologists, herpetologists, anglers, swimmers, boaters, naturalists, and hunters who are adversely affected by Vorsteveld's unpermitted discharges and the resulting poor water quality in Dead Creek, Lower Otter Creek, and Lake Champlain.

IDENTIFICATION OF LEGAL COUNSEL

CLF and VNRC are represented by legal counsel in this matter. Pursuant to 40 C.F.R. § 135.3(c), the contact information for those providing legal counsel at CLF and VNRC are as follows:

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RELIEF REQUESTED

Vorsteveld is liable for the violations described above. Each separate violation of the CWA subjects the violator to a penalty of up to the maximum amount allowed pursuant to 33 U.S.C. §§ 1319(d), 1365(a), and 40 C.F.R. §§ 19.1–19.4. CLF will seek the full penalties allowed by the law.

In addition to civil penalties, CLF will seek declaratory relief and injunctive relief to prevent further violations of the CWA, pursuant to 33 U.S.C. § 1365(a) and (d), and such other relief as permitted by law. CLF will seek an order from the Court requiring Vorsteveld to correct all identified violations through direct implementation of control measures and demonstration of full regulatory compliance. Pursuant to 33 U.S.C. § 1365(d), CLF will also seek recovery of costs and fees associated with this matter.

Conservation Law Foundation

VERMONT NATURAL RESOURCES COUNCIL

CONCLUSION

Additional information, including information in Vorsteveld's possession, may reveal further details about the violations described above, as well as details about additional violations of the CWA. This Notice Letter covers all such violations, as well as additional violations of a similar nature occurring during the 60-day notice period.

During the 60-day notice period, CLF will be available to discuss effective remedies and actions for the violations noted in this letter that may avoid the necessity of further litigation. If you wish to pursue such discussions, please have your attorney contact us at (802) 622-3010. We do not intend to delay the filing of a complaint in the United States District Court for the District of Vermont if discussions are continuing at the conclusion of the 60 days.

Sincerely,

/s/ Mason Overstreet
John C. Mason Overstreet, Esq.
R. Scott Sanderson, Esq.
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VNRC VERMONT NATURAL RESOURCES COUNCIL

Attachment A

The following table describes the pollutants that Vorsteveld discharged from its outfall pipes on various dates in violation of the CWA:

Pipe	Date	Pollutants Discharged
CF-2	5/22/2024	Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
CF-2	6/5/2024	Atrazine, Metolachlor, Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
CF-2	7/12/2024	Atrazine, Metolachlor, Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
CF-2	4/2/2025	Clothianidin, Clothianidin-n-desmethyl, Thiamethoxam, Trifloxystrobin, Flutriafol, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
CF-2	4/14/2025	Clothianidin, Clothianidin-n-desmethyl, Thiamethoxam, Flutriafol, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
CF-2	5/6/2025	Clothianidin, Thiamethoxam, Imidacloprid, Clothianidin urea, Clothianidin-n-desmethyl, Tebuconazole, Myclobutanil, Flutriafol, Propiconazole, Azoxystrobin, Nitrate, Nitrogen, Phosphorus, Biological oxygen demand, Total suspended solids.
CF-2	5/9/2025	Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Tebuconazole, Metalaxyl, Flutriafol, Ipconazole, Azoxystrobin, Nitrate, Nitrogen, Phosphorus, Biological oxygen demand, Total suspended solids.
CF-2	6/12/2025	Atrazine, Metolachlor, Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Flutriafol, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
CF-2	6/30/2025	Atrazine, Metolachlor, Clothianidin, Thiamethoxam, Clothianidin-n-desmethyl, Tebuconazole, Flutriafol.
CF-3	8/6/2024	Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
CF-4a	5/16/2024	Metolachlor, Clothianidin, Thiamethoxam, Clothianidin urea, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
CF-4a	5/22/2024	Clothianidin, Imidacloprid, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
CF-4a	5/28/2024	Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
CF-4a	6/5/2024	Atrazine, Metolachlor, Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
CF-4a	7/12/2024	Metolachlor, Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
CF-4a	8/6/2024	Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
CF-4a	3/19/2025	Clothianidin, Thiamethoxam, Flutriafol, Nitrate, Nitrogen, Phosphorus.
CF-4a	6/30/2025	Atrazine, Metolachlor, Clothianidin, Flutriafol, Nitrate, Nitrogen, Phosphorus.
CF-4a	7/1/2025	Atrazine, Metolachlor, Clothianidin, Thiamethoxam, Clothianidin urea, Flutriafol, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
CF-5a	7/14/2025	Atrazine, Metolachlor, Clothianidin, Clothianidin-n-desmethyl, Carbendazim.
CF-5b	3/19/2025	Clothianidin, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
CF-5b	6/30/2025	Atrazine, Metolachlor, Clothianidin, Nitrate, Nitrogen, Phosphorus.

CF-5b	7/1/2025	Atrazine, Metolachlor, Clothianidin, Carbendazim, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
LT-1	4/25/2024	Clothianidin, Thiamethoxam, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
LT-1	5/16/2024	Clothianidin, Thiamethoxam, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
LT-1	5/22/2024	Clothianidin, Imidacloprid, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
LT-1	5/28/2024	Clothianidin, Imidacloprid, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
LT-1	7/12/2024	Atrazine, Metolachlor, Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
LT-1	4/2/2025	Clothianidin, Clothianidin-n-desmethyl, Thiamethoxam, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
NM-1	4/25/2024	Clothianidin, Thiamethoxam, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus.
NM-1	5/16/2024	Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
NM-1	5/22/2024	Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
NM-1	5/28/2024	Clothianidin, Imidacloprid, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
NM-1	6/5/2024	Atrazine, Metolachlor, Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
NM-1	7/12/2024	Metolachlor, Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
NM-1	8/6/2024	Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
NM-1	3/19/2025	Clothianidin, Clothianidin-n-desmethyl, Flutriafol, Trifloxystrobin, Nitrate, Nitrogen, Phosphorus, Biological oxygen demand, Total suspended solids.
NM-1	4/2/2025	Clothianidin, Clothianidin-n-desmethyl, Thiamethoxam, Flutriafol, Nitrate, Nitrogen, Phosphorus.
NM-1	4/14/2025	Clothianidin, Clothianidin-n-desmethyl, Trifloxystrobin, Flutriafol, Nitrate, Nitrogen, Phosphorus.
NM-1	4/27/2025	Clothianidin, Thiamethoxam, Clothianidin-n-desmethyl, Metalaxyl, Flutriafol, Ipconazole, Nitrogen, Phosphorus, Total suspended solids.
NM-1	5/6/2025	Clothianidin urea, Thiamethoxam urea, Clothianidin-n-desmethyl, Pyraclostrobin, Propiconazole, Nitrate, Nitrogen, Phosphorus, Biological oxygen demand, Total suspended solids, Clothianidin, Thiamethoxam.
NM-1	5/9/2025	Clothianidin, Thiamethoxam, Clothianidin urea, Thiamethoxam urea, Clothianidin-n-desmethyl, Tebuconazole, Pyraclostrobin, Propiconazole, Flutriafol, Ipconazole, Nitrate, Nitrogen, Phosphorus, Biological oxygen demand, Total suspended solids.
NM-1	5/14/2025	Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Tebuconazole, Flutriafol, Ipconazole, Carbendazim, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
NM-1	5/28/2025	Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Propiconazole, Flutriafol, Carbendazim, Nitrogen, Phosphorus, Total suspended solids.
NM-1	6/12/2025	Atrazine, Metolachlor, Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Azoxystrobin, Nitrate, Nitrogen, Phosphorus, Biological oxygen demand, Total suspended solids.
NM-1	6/30/2025	Atrazine, Metolachlor, Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Tebuconazole, Flutriafol, Nitrate, Nitrogen, Phosphorus.

NM-1	7/1/2025	Atrazine, Metolachlor, Clothianidin, Thiamethoxam, Clothianidin urea, Thiamethoxam urea, Clothianidin-n-desmethyl, Flutriafol, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
NM-1	7/14/2025	Atrazine, Metolachlor, Clothianidin, Thiamethoxam, Clothianidin-n-desmethyl, Propiconazole, Flutriafol, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
NM-3	4/25/2024	Clothianidin, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus.
NM-3	5/16/2024	Clothianidin, Thiamethoxam, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus.
NM-3	5/22/2024	Clothianidin, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus.
NM-3	5/28/2024	Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus.
NM-3	6/5/2024	Atrazine, Metolachlor, Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus.
NM-3	7/12/2024	Metolachlor, Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
NM-3	8/6/2024	Metolachlor, Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus.
NM-3	3/19/2025	Clothianidin, Clothianidin-n-desmethyl, Flutriafol, Trifloxystrobin, Nitrate, Nitrogen, Phosphorus, Biological oxygen demand, Total suspended solids.
NM-3	4/2/2025	Clothianidin, Clothianidin-n-desmethyl, Thiamethoxam, Trifloxystrobin, Flutriafol, Nitrate, Nitrogen, Phosphorus.
NM-3	4/14/2025	Clothianidin, Clothianidin-n-desmethyl, Trifloxystrobin, Flutriafol, Nitrate, Nitrogen, Phosphorus.
NM-3	4/27/2025	Clothianidin, Clothianidin-n-desmethyl, Clothianidin urea, Tebuconazole, Metalaxyl, Nitrate, Nitrogen, Phosphorus.
NM-3	5/6/2025	Clothianidin, Thiamethoxam, Clothianidin urea, Thiamethoxam urea, Clothianidin-n-desmethyl, Propiconazole, Flutriafol, Azoxystrobin, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
NM-3	5/9/2025	Clothianidin, Thiamethoxam, Clothianidin urea, Thiamethoxam urea, Clothianidin-n-desmethyl, Tebuconazole, Propiconazole, Flutriafol, Ipconazole, Azoxystrobin, Carbendazim, Nitrate, Nitrogen, Phosphorus, Biological oxygen demand, Total suspended solids.
NM-3	5/14/2025	Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Propiconazole, Flutriafol, Carbendazim, Nitrate, Nitrogen, Phosphorus.
NM-3	5/28/2025	Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Propiconazole, Flutriafol, Carbendazim, Nitrate, Nitrogen, Phosphorus.
NM-3	6/12/2025	Atrazine, Metolachlor, Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Flutriafol, Trifloxystrobin, Tebuconazole, Propiconazole, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
NM-3	7/1/2025	Atrazine, Metolachlor, Clothianidin, Thiamethoxam, Clothianidin urea, Thiamethoxam urea, Clothianidin-n-desmethyl, Propiconazole, Flutriafol, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
P-2	4/14/2025	Clothianidin, Clothianidin-n-desmethyl, Trifloxystrobin, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
P-2	5/6/2025	Clothianidin, Clothianidin urea, Clothianidin-n-desmethyl, Tebuconazole, Propiconazole, Flutriafol, Azoxystrobin, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
P-2	5/9/2025	Clothianidin, Clothianidin urea, Clothianidin-n-desmethyl, Tebuconazole, Metalaxyl, Pyraclostrobin, Propiconazole, Ipconazole, Azoxystrobin, Nitrate, Nitrogen, Phosphorus, Biological oxygen demand, Total suspended solids.
P-2	5/14/2025	Clothianidin, Clothianidin urea, Clothianidin-n-desmethyl, Tebuconazole, Metalaxyl, Pyraclostrobin, Ipconazole, Nitrate, Nitrogen, Phosphorus, Total suspended solids.

P-2	5/28/2025	Clothianidin, Clothianidin urea, Clothianidin-n-desmethyl, Metalaxyl, Propiconazole, Azoxystrobin, Carbendazim, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
P-2	6/12/2025	Atrazine, Metolachlor, Clothianidin, Clothianidin urea, Clothianidin-n-desmethyl, Flutriafol, Azoxystrobin, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
SF-6	4/25/2024	Clothianidin, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus.
SF-6	5/16/2024	Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
SF-6	5/22/2024	Clothianidin, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
SF-6	5/28/2024	Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
SF-6	6/5/2024	Atrazine, Metolachlor, Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
SF-6	7/12/2024	Metolachlor, Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
SF-6	8/6/2024	Metolachlor, Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
SF-6	3/19/2025	Clothianidin, Clothianidin-n-desmethyl, Dinotefuran, Tebuconazole, Nitrogen, Nitrate, Phosphorus, Total suspended solids.
SF-6	4/2/2025	Clothianidin, Clothianidin-n-desmethyl, Tebuconazole, Nitrogen, Phosphorus, Total suspended solids.
SF-6	4/14/2025	Clothianidin, Clothianidin-n-desmethyl, Propiconazole, Phosphorus.
SF-6	4/27/2025	Clothianidin, Clothianidin urea, Clothianidin-n-desmethyl, Flutriafol, Ipconazole, Phosphorus.
SF-6	5/6/2025	Clothianidin, Thiamethoxam, Clothianidin urea, Thiamethoxam urea, Clothianidin-n-desmethyl, Azoxystrobin, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
SF-6	5/9/2025	Clothianidin, Thiamethoxam, Clothianidin urea, Thiamethoxam urea, Clothianidin-n-desmethyl, Tebuconazole, Propiconazole, Flutriafol, Ipconazole, Azoxystrobin, Nitrate, Nitrogen, Phosphorus, Biological oxygen demand, Total suspended solids.
SF-6	5/14/2025	Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Trifloxystrobin, Tebuconazole, Propiconazole, Ipconazole, Azoxystrobin, Carbendazim, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
SF-6	5/28/2025	Clothianidin, Thiamethoxam, Clothianidin urea, Clothianidin-n-desmethyl, Trifloxystrobin, Tebuconazole, Propiconazole, Ipconazole, Azoxystrobin, Carbendazim, Nitrate, Nitrogen, Phosphorus.
SF-6	6/12/2025	Atrazine, Metolachlor, Clothianidin, Thiamethoxam, Clothianidin-n-desmethyl, Nitrate, Nitrogen, Phosphorus, Total suspended solids.
SF-6	6/30/2025	Atrazine, Metolachlor, Clothianidin, Thiamethoxam, Clothianidin-n-desmethyl, Trifloxystrobin, Tebuconazole, Propiconazole, Nitrate, Nitrogen, Phosphorus.
SF-6	7/1/2025	Atrazine, Metolachlor, Clothianidin, Thiamethoxam, Thiamethoxam urea, Clothianidin-n-desmethyl, Trifloxystrobin, Tebuconazole, Propiconazole, Nitrate, Nitrogen, Phosphorus.
SF-6	7/14/2025	Atrazine, Metolachlor, Clothianidin, Thiamethoxam, Clothianidin-n-desmethyl, Trifloxystrobin, Propiconazole, Azoxystrobin, Nitrate, Nitrogen, Phosphorus.
SF-7	3/19/2025	Clothianidin, Clothianidin-n-desmethyl, Trifloxystrobin, Tebuconazole, Propiconazole, Nitrogen, Nitrate, Phosphorus, Total suspended solids.
SF-7	7/14/2025	Atrazine, Metolachlor, Clothianidin, Thiamethoxam, Clothianidin urea, Trifloxystrobin, Propiconazole, Azoxystrobin, Nitrate, Nitrogen, Phosphorus.