1/5/16

Provision of Safe Drinking Water in Hoosick Falls, NY

Interim Measures

Bottled Water:

- Immediately - continue current program of providing bottled water to residents, supplemented in the following ways:
    - Establish a procedure for delivery of bottled water directly to elderly or disabled residents and those with transportation issues. The deliveries should be arranged for by Saint-Gobain with a water delivery company and should not depend on volunteers in the community. The procedure should include:
        - Telephone hotline and/or email address for residents to use to request home delivery;
        - System for regular delivery starting the day following the request and approval; and
        - Maintenance of a log recording all requests for delivery and the actions taken. The log should include address and contact information.
    - Also establish a procedure for residents with a need for an additional volume of bottled water (beyond 5 gallons per day for the household) to request the appropriate volume needed by their household.[1] The procedure should include:
        - Telephone hotline and/or email address for residents to use to request the additional volume of water;
        - System for supplying a voucher that the requestor can present at water distribution outlet starting the day following the request and approval; and
        - Maintenance of a log recording all requests for additional volume and the actions taken. The log should include address and contact information.

- Within 21 days – submit an evaluation of the effectiveness of the program to provide bottled water, including the enhancements for home delivery and expanded volume. The evaluation should also include an evaluation of the feasibility of providing additional options for water delivery, including installation of tanks (to be filled by approved water haulers) to dispense water from other areas of the village.

- Ensure that all of the plastic water bottles used in the bottled water program are recycled.

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[1] Until a treatment system is in place at the public water supply and confirmed to be consistently removing PFOA below the level set by EPA's health advisory, EPA is recommending the use of bottled water not only for drinking but also for cooking, teeth-brushing, and for use with a humidifier, if any.

Private Wells:

- Within 15 days – identify all private wells (including wells serving non-community public water systems) in Hoosick Falls that are still being used for potable purposes.

- Within 15 days thereafter, make offer to well owner to sample the private well to determine whether PFOA contamination is present.
    - Collect samples within 5 days of obtaining access from well owner.
    - Have samples analyzed as soon as possible in a certified laboratory using EPA Method 537.
    - As soon as lab results are obtained, provide results to well owner and Village, Rensselaer County DOH, State DOH and EPA.
    - Maintain a log book listing the address and contact information for each such private well, the date of the offer to sample the private well, and whether the offer was accepted.

- If PFOA is detected in one of the private wells at a level at or above the EPA health advisory,
    - Immediately commence providing the impacted home or business owner with bottled water until the well can be eliminated or treated.
    - Within 30 days, provide for the installation of Point of Entry Treatment (POET) for the home or business served by the private well; or within 30-90 days (depending on the water line's proximity), connect the home or business to the public water supply.
    - If a POET system is used, maintain the system and continue quarterly monitoring for PFOA (both the raw water and the water treated by the POET system).

Temporary Public Water Supply Treatment System:

- Within 10 days – submit an evaluation of the feasibility of installing temporary treatment (i.e., rented truck mounted GAC system) on the public water supply wells while the permanent treatment system is designed and built. The evaluation should include:
    - Costs of temporary treatment units and any retrofitting necessary to connect the temporary treatment;
    - Schedule for obtaining Rensselaer County DOH and State DOH approval for the temporary treatment;
    - Schedule for installation of temporary treatment system;
    - Monitoring plan to assure reduction in PFOA levels.

- If the evaluation shows a temporary treatment system is feasible, install the system and have it operational by February 1, 2016. The system should be designed to remove PFOA to the minimum reporting limit that can be reliably achieved by the analytical laboratory when using EPA Method 537.

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- Monitor and maintain the temporary system until permanent treatment system in place and operational.

Long-term Measures:

Public Water Supply:

- Design and installation of permanent treatment system for Hoosick Falls public water system.
    - Within 14 days – provide a design and construction schedule for the installation of a permanent treatment system. The schedule should include dates and interim milestones for the following:
        - Submission to Rensselaer County DOH and State DOH, for review/approval, of engineering plans and specifications for a treatment system designed to remove PFOA to the minimum reporting limit that can be reliably achieved by the analytical laboratory when using EPA Method 537. The design of the treatment system should consider the range of PFOA concentrations from groundwater sampling performed to date (including the sample results from the monitoring wells at Saint-Gobain's McCaffrey Street facility) and allow for expansion of the treatment system, if needed, in the future.
        - Construction contract bid(s), award(s) and notice(s) to proceed.
        - Dates for start and completion of construction.
        - Obtaining any necessary permits for the construction and/or operation of the treatment system, including the option of emergency permits if applicable.
        - Submittal to Rensselaer County DOH and State DOH of plan for ensuring appropriate training for the public water system operators to properly operate and maintain the water treatment plant.
        - Dates for startup and testing of the treatment system.
        - Date to commence operation of the treatment system (no later than 10/30/2016).
    - Develop and implement (following review/approval by Rensselaer County DOH and State DOH) a long-term operation and maintenance plan for the treatment system, which includes, among other things, monitoring of the treated and untreated water at the public water supply.

Private Wells:

- On a quarterly basis, continue to sample the private wells in the Village that are used for potable purposes and have the samples analyzed for PFOA in a certified laboratory using EPA Method 537.
- All sampling results should be promptly provided to the well owner and the Village, Rensselaer County DOH, State DOH and EPA.
- If/when any private wells are found to have PFOA at or above the EPA health advisory level:

- Immediately commence providing the impacted home or business owner with bottled water until the well can be eliminated or treated.
- Within 30 days, provide for the installation of POET for the home or business served by the private well; or within 30-90 days (depending on the water line's proximity), connect the home or business to the public water supply.
- If a POET system is used, maintain the system and continue quarterly monitoring for PFOA (both the raw water and the water treated by the POET system).