HICKSVILLE WATER DISTRICT

4 DEAN STREET
POST OFFICE BOX 9065

HICKSVILLE, N.Y. 11802-9065
516/931-0184
FAX 516/931-6506

BOARD OF WATER COMMISSIONERS

NICHOLAS J. BRIGANDI
COMMISSIONER

KARL M. SCHWEITZER
COMMISSIONER

WILLIAM SCHUCKMANN
COMMISSIONER

POPULATION SERVED
OVER 47,000

FOUNDED 1921

ANTHONY IANNONE
SUPERINTENDENT

July 7, 2016

Regional Administrator Judith A. Enck
US Environmental Protection Agency - Region 2
290 Broadway
New York, New York 10007-1866

Re: Hicksville Water District
Plant No. 4 – Newbridge Road
1,4 - Dioxane Sampling Program

Dear Regional Administrator Enck:

Our consulting engineer, H2M architects + engineers, has previously written to you in a letter dated April 18, 2016, requesting any information the United State Environmental Protection Agency (EPA) may have regarding potential sources of VOCs, including 1,4-dioxane, upgradient of the Hicksville Water District's Well No. 4-2 (NYSDEC No. N-08526). We are in receipt of your June 7, 2016 response and request that your agency take immediate action to investigate and collect groundwater data upgradient of Well No. 4-2.

As you are aware, the Hicksville Water District (District), located in Long Island, NY, supplies potable water to its 48,000 customers by means of groundwater wells. The District's Well No. 4-2, located on Newbridge Road in Hicksville, NY, was originally constructed in 1969 to a depth of 600 feet below ground with an authorized capacity of 1,400 GPM. This well provided a clean source of water for approximately twenty years until trichloroethene (TCE) and tetrachloroethene (PCE) were detected in the well product. Two granular activated carbon (GAC) vessels were installed to treat these contaminants. However in 1995, the GAC vessels were replaced by an air stripping tower to address the newly detected VOCs. 1,4-dioxane was first detected in Well No. 4-2 in 2013 as part of the Unregulated Contaminant Monitoring Rule (UCMR) program, a contaminant that is unfortunately not effectively removed the current VOC treatment system.

As of March 2016, Well No. 4-2 exhibited the highest levels of 1,4-dioxane among New York State water suppliers with a maximum detection of 34 μg/l. This is above 50% the New York State Maximum Contaminant Level (MCL) of 50 μg/l for unspecified organic contaminants. Additionally, 1,4-dioxane has been classified by your agency as a probable human carcinogen. We believe such statistics and classification is enough to warrant an EPA sampling program of all EPA sites that are potentially impacting Well No. 4-2. We are aware of your data collection programs including the study of "Operable Unit 2" located west of Well No. 4-2, and the New York State Department of Environmental Conservation (DEC) sampling program of the Northrop Grumman plume; however, the alarming concentrations of 1,4-dioxane in Well No. 4-2 calls for special attention from the EPA.

Well No. 4-2 is in the vicinity of several industrial sites in the area which feasibly may have impacted this well including areas containing 1,1,1-trichloroethane (1,1,1-TCA). As listed in the technical fact sheet for 1,4-dioxane, published by the EPA in January 2014, 1,4-dioxane is a stabilizer for chlorinated solvents and is likely to be present in sites contaminated with such chemicals, particularly 1,1,1-TCA. It is possible that one or more of these sites are sources affecting the groundwater quality.

Unfortunately, a failure of the UCMR program is that beyond testing point-of-entry for public water suppliers, there is absolutely no other testing required or performed. Following detection of a known solvent related contaminant in a well, comprehensive testing of the groundwater upgradient of the well should have been an immediate next step taken by the EPA. A point in time sample at an entry point location tells us nothing about the extent of the contamination or the ultimate risk to the well. As such, we respectfully request that your office direct a sampling program at all known sites (on and off site) that could be impacting Well No. 4-2 with 1,4-dioxane.

Should you have any questions or concerns, please contact our office.

Very truly yours,

Hicksville Water District

Anthony Iannone

Anthony Iannone, Superintendent

cc: Joseph Frank, Esq.
Basil Seggos - NYSDEC Acting Commissioner
Carrie M. Gallagher – NYSDEC Region 1 Regional Director
Richard W. Humann, P.E. - H2M architects + engineers

X:\HKWD (Hicksville Water District) - 16510\HKWD1604 - Plant No. 4 VOC Upgrades\Correspondence\16.07.06 - Sampling Request - EPA.docx

RECEIVED
2016 JUL 12 PM 12:20
U.S. EPA REGION 2
CORRESPONDENCE CONTROL

HICKSVILLE WATER DISTRICT

4 DEAN STREET
POST OFFICE BOX 9065

HICKSVILLE, N.Y. 11802-9065
516/931-0184
FAX 516/931-6506

BOARD OF WATER COMMISSIONERS

NICHOLAS J. BRIGANDI
COMMISSIONER

KARL M. SCHWEITZER
COMMISSIONER

WILLIAM SCHUCKMANN
COMMISSIONER

POPULATION SERVED
OVER 47,000

FOUNDED 1921

ANTHONY IANNONE
SUPERINTENDENT

July 7, 2016

Regional Director Carrie M. Gallagher
New York State Department of Environmental Conservation – Region 1
50 Circle Road
Stony Brook, NY 11790-3409

Re: Hicksville Water District
Plant No. 4 – Newbridge Road
1,4 - Dioxane Sampling Program

Dear Regional Director Gallagher:

Our consulting engineer, H2M architects + engineers, has previously written to you in a letter dated April 18, 2016, requesting any information the New York State Department of Environmental Conservation (DEC) may have regarding potential sources of VOCs, including 1,4-dioxane, upgradient of the Hicksville Water District's Well No. 4-2 (NYSDEC No. N-08526). Additionally, we are writing to you requesting that your agency take immediate action to investigate and collect groundwater data upgradient of Well No. 4-2.

As you are aware, the Hicksville Water District, located in Long Island, NY, supplies potable water to its 48,000 customers by means of groundwater wells. The District's Well No. 4-2, located on Newbridge Road in Hicksville, NY, was originally constructed in 1969 to a depth of 600 feet below ground with an authorized capacity of 1,400 GPM. This well provided a clean source of water for approximately twenty years until trichloroethene (TCE) and tetrachloroethene (PCE) were detected in the well product. Two granular activated carbon (GAC) vessels were installed to treat these contaminants. However in 1995, the GAC vessels were replaced by an air stripping tower to address the newly detected VOCs. 1,4-dioxane was first detected in Well No. 4-2 in 2013, as part of the United State Environmental Protection Agency (EPA) Unregulated Contaminant Monitoring Rule (UCMR) program, a contaminant that is unfortunately not effectively removed the current VOC treatment system.

As of March 2016, Well No. 4-2 exhibited the highest levels of 1,4-dioxane among New York State water suppliers with a maximum detection of 34 μg/l. This is above 50% the New York State Maximum Contaminant Level (MCL) of 50 μg/l for unspecified organic contaminants. Additionally, 1,4-dioxane has been classified by the EPA as a probable human carcinogen. We believe such statistics and classification is enough to warrant a DEC sampling program of all DEC sites that are potentially impacting Well No. 4-2. We are aware of the EPA data collection programs including a study located west of Well No. 4-2, and the DEC sampling program of the Northrop Grumman plume; however, the alarming concentrations of 1,4-dioxane in Well No. 4-2 calls for special attention from the DEC.

Well No. 4-2 is in the vicinity of several industrial sites in the area which feasibly may have impacted this well including areas containing 1,1,1-trichloroethane (1,1,1-TCA). As listed in the technical fact sheet for 1,4-dioxane, published by the EPA in January 2014, 1,4-dioxane is a stabilizer for chlorinated solvents and is likely to be present in sites contaminated with such chemicals, particularly 1,1,1-TCA. It is possible that one or more of these sites are sources affecting the groundwater quality.

Unfortunately, a failure of the UCMR program is that beyond testing point-of-entry for public water suppliers, there is absolutely no other testing required or performed. Following detection of a known solvent related contaminant in a well, comprehensive testing of the groundwater upgradient of the well should have been an immediate next step. A point in time sample at an entry point location tells us nothing about the extent of the contamination or the ultimate risk to the well. As such, we respectfully request that your office direct a sampling program at all known sites (on and off site) that could be impacting Well No. 4-2 with 1,4-dioxane.

Should you have any questions or concerns, please contact our office.

Very truly yours,

Hicksville Water District

Anthony Iannone, Superintendent

cc: Joseph Frank, Esq.
Basil Seggos - NYSDEC Acting Commissioner
Judith A. Enck - USEPA Region 2 Regional Administrator
Richard W. Humann, P.E. - H2M architects + engineers

X:\HKWD (Hicksville Water District) - 10510\HKWD1604 - Plant No. 4 VOC Upgrades\Correspondence\16 07.06 - Sampling Request - DEC.docx

After 5 days, return to

HICKSVILLE WATER DISTRICT
4 Dean Street • P.O. Box 9065
Hicksville, NY 11802-9065

neopost
07/07/2016
US POSTAGE $000.46[5]

FIRST-CLASS MAIL

ZIP 11801
041L11253475

REGIONAL ADMINISTRATOR
JUDITH A ENCK
US ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK NEW YORK 10007-1866

10007-188699

ED_002631A_00005382-00005