Message

From: Matlock, Dennis [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7EB30E129A9246E5B47301D1D0622A15-DMATLOCK]
Sent: 12/6/2017 9:18:25 PM
To: Ex. 4 CBI @TechLawInc.com]
Subject: FW: PADEN CITY PCE
Attachments: pn-template-tier-2 Chem MCL.doc

From: Towle, Michael
Sent: Wednesday, September 27, 2017 8:51 AM
To: Matlock, Dennis <Matlock.Dennis@epa.gov>
Subject: FW: PADEN CITY PCE

Hi Den, FYI

From: Towle, Michael
Sent: Wednesday, September 27, 2017 8:50 AM
To: 'Josh Billiter' <josh.billiter.padencity@gmail.com>; 'Lew Baker' <lewbaker@wvrwa.org>
Subject: FW: PADEN CITY PCE

Good morning. I am simply forwarding a string of email traffic to you that I hope will answer your questions. I still believe that unless the water system has suffered a compliance issue in the delivered water (which may warrant some very specific public notification requirements), local officials would be able to provide the information it deems most appropriate. That information could be focused on the news that you have found a threat, you are taking steps to deal with it, your system has equipment in place to insure that the delivered water is safe, you are being proactive to investigate and insure that the problem does not worsen, and you have sought assistance in that matter. Adding information about PCE and its very common usage in dry cleaning operations and some information about its basic health effects could be added. If you need some help with that language (other than what might be available in the information in the email string or attachments), please let me know and I'll try to get some. But, I think that WVDHHR/BPH would be equally helpful. Thanks.

From: Wisniewski, Patti-Kay
Sent: Wednesday, September 27, 2017 7:49 AM
To: Towle, Michael <Towle.Michael@epa.gov>
Subject: RE: PADEN CITY PCE

Mike
Please make certain that this water system is talking with WV DHHR/BPH staff. This is the agency regulating the water systems. That does not fall under WV DEP. WV DHHR will assist with compliance determinations and any state notification requirements. One sample may not trigger a violation which necessitates Public Notice. Nor would raw water. Finished water samples are used for compliance purposes.

Here is a fact sheet about talking to consumers that may be helpful:

Talking to your Customers about Chronic Contaminants in Drinking Water

This fact sheet helps you understand the importance of communicating with the public about chronic contaminants. It also describes effective strategies for getting your message out.

- Talking to your Customers about Chronic Contaminants in Drinking Water (PDF)(2 pp, 381 K, About PDF)
  EPA 816-F-07-022, October 2007

And attached is the template with a page of instructions. EPA provided these for the water systems. They need to insert the proper statements where indicated.

Patti Kay

From: Towle, Michael
Sent: Tuesday, September 26, 2017 4:41 PM
To: Wisniewski, Patti-Kay <Wisniewski.Patti-Kay@epa.gov>
Subject: RE: PADEN CITY PCE

Thank you. It is my understanding that there is no MCL exceedance, so there is no public notice requirement. But, they want to be prepared if they get one.

I would appreciate a template for such a notice.

From: Wisniewski, Patti-Kay
Sent: Tuesday, September 26, 2017 3:28 PM
To: Towle, Michael <Towle.Michael@epa.gov>
Subject: RE: PADEN CITY PCE

Mike
That would be me and a co-worker Heather Arvanaghi who is learning the rule to take the lead from me.

Here is the mandatory health effects language for use in notices under the National Primary Drinking Water Regulations.
Some people who drink water containing tetrachloroethylene in excess of the MCL over many years could have problems with their liver, and may have an increased risk of getting cancer.

I'm not sure I fully understand the issues, so if a public notice is required by the SDWA than it needs to meet all of the elements of a notice. If they are doing the notice for other reasons, such as raising awareness but there isn't an exceedance, they have some flexibility on content.

We have templates for these notices. Do you want to see one of those for an MCL exceedance?
Patti Kay

From: Towle, Michael
Sent: Tuesday, September 26, 2017 3:17 PM
To: Wisniewski, Patti-Kay <Wisniewski.Patti-Kay@epa.gov>
Subject: FW: PADEN CITY PCE

Hi Patti-Kay

We have been asked to conduct a removal site evaluation of a Site in Paden City, WV at which local officials believe that a former dry cleaners may be impacting the drinking water supply with low levels of PCE. You will see from the email string below, that officials are trying to craft a message for the public. From what I understand, the levels are well below the SDWA standards. Nonetheless, they are looking for language that I believe would be akin to a PN. Could you please advise on a proper Water contact for me to work with to help the local officials with the issue. Thanks.

From: Lew Baker [mailto:lewbaker@wvrwa.org]
Sent: Tuesday, September 26, 2017 3:02 PM

To: Towle, Michael <Towle.Michael@epa.gov>
Subject: RE: PADEN CITY PCE

Yes, please send the required language for a PCE violation. We may not need it yet, but should get a copy just in case.

Thanks again.

From: Towle, Michael [mailto:Towle.Michael@epa.gov]
Sent: Tuesday, September 26, 2017 2:35 PM
To: Lew Baker; 'Josh Billiter'
Cc: Ellars, James W
Subject: RE: PADEN CITY PCE

Hi

The meaning of my comment was as follows: If the PCE is present in the water such that there is a violation of the Safe Drinking Water Act, then the Public should be notified in accordance with the SDWA as required. It is my understanding, however, from the information so far supplied to me, that such violation is not the case. I think first you have to determine if there is a violation that triggers the requirement to notify. If not, then I think the language you use can be your own. I do not work extensively with our Water Division, so I am not familiar with the specific language requirements of a Public Notice under the SDWA. If you would like me to find out, please advise. Thanks.

From: Lew Baker [mailto:lewbaker@wvrwa.org]
Sent: Tuesday, September 26, 2017 1:47 PM
To: 'Josh Billiter' <josh.billiter.padencity@gmail.com>; Towle, Michael <Towle.Michael@epa.gov>
Cc: Ellars, James W <James.W.Ellars@wv.gov>
Subject: RE: PADEN CITY PCE

Thanks Josh

I thought we did a good job writing that letter for the public, but WVBPH thinks it may be too much info and yet not say everything that's required.

Michael, please send copies of the required text for a public notification of PCE. I can't find it online. Hopefully we can use it to inform customers without scaring them. We also hope to hear that we can soon get assistance from EPA and/or WVDEP on testing of the aquifer to define the PCE plume.

Lew Baker
WVRWA
Ex. 6 Personal Privacy (PP)

From: Josh Billiter [mailto:josh.billiter.padencity@gmail.com]
Sent: Tuesday, September 26, 2017 10:52 AM
To: Lewis Baker
Subject: Fwd: PADEN CITY PCE

---------- Forwarded message ----------
From: **Towle, Michael** <Towle.Michael@epa.gov>
Date: Fri, Sep 15, 2017 at 11:32 AM
Subject: RE: PADEN CITY PCE
To: Josh Billiter <josh.billiter.padencity@gmail.com>

Good morning Josh.

At this time, I would suggest the following:

1. The City inform the public as it would be otherwise be required with respect to water delivery to customers. If the levels or activities require notification, then such should be made. If the delivered water meets all standards, then such notification is not likely required.

2. From my perspective, it is always helpful to keep the public informed. But, there is a difficult balance between information intending to be helpful and information that simply causes concern. You'll have to ask whether the level of difficulty addressing the issue right now and dealing with the concern now is more or less complicated than explaining later on why the public wasn't informed sooner. I have seen both approaches work and fail. Very tough call. You may know the community and officials better than most. It'll need to be relayed sooner or later, especially if we start to investigate sources of contamination.

3. You may have more control of the message now than later. Your message is a good one. You have found a threat. You are taking steps to deal with it. Your system has equipment in place to insure that the delivered water is safe. You are being proactive to investigate and insure that the problem does not worsen. You have sought assistance in that matter.

4. there is an insufficient amount of information available to provide about "what is going on".

5. We can help craft a message about the PCE if you want. We have access to professionals that deal with this all the time. We have worked these kinds of issues elsewhere.

This may not be helpful for you, but these are thoughts that cross my mind. Please let us know if we can help. Good luck.

From: Josh Billiter [mailto:josh.billiter.padencity@gmail.com]
Sent: Friday, September 15, 2017 7:26 AM
To: Towle, Michael <Towle.Michael@epa.gov>
Subject: PADEN CITY PCE

Michael,

My name is Josh Billiter, with Paden City Water Works, I'm contacting you regarding our PCE issues. I have been advised by Lew Baker of WV Rural Water to send out a letter to the public explaining what is going on and what PCE is and the potential health concerns. Yesterday I received a phone call from Ronda Savilla that after talking with her supervisors that this letter is not needed and will only induce a panic. I would like your

input before I go one way or another with this issue. I'm trying to be open about the issue, but at the same time I'm not to incite a great panic within the community. Any advice on this would be greatly appreciated.

Thank You,

Josh Billiter

Chief Water Operator

Paden City Water Works