From: Hartzell, Sharon
To: Carpenter, Angela; Vaughn, Stephanie; Pocze, Doug
Cc: Austin, Mark
Subject: RE: Brookhaven Private Well Survey
Date: Wednesday, January 30, 2019 11:03:00 AM

Hi all,
I caught up with BNL this morning and have a few updates on the PFAS situation. BNL has been investigating PFAS on the base (maximum on-base exceedance of 12,444 ng/L) and are continuing to sample near on-base sources. They submitted a Phase 3 Work Plan in December, which we are still reviewing, though sampling has begun and is ongoing. BNL has installed vertical profile wells along the southern boundary and downgradient of major source areas. Some data has come in, with PFAS detected but below the 70 ppt HAL. The Western South Boundary still needs to be completed. BNL will be submitting a Phase 3 Plan Addendum, expected next week, which will outline continued Phase 3 work including proposed locations for permanent sampling. I am compiling comments on the Phase 3 workplan but will revise them based on the addendum received. Our main comments were geared towards makings sure that BNL is adequately characterizing PFAS at the boundary, particularly in shallow depths which are most relevant to the drinking water wells in the area. This should become clear when we receive the addendum.
Suffolk County Department of Health Services submitted a letter prior to the shutdown requesting sampling of 97 private wells outside the boundary of the base. DEC submitted a similar letter on January 16th, also calling on BNL to do the private well sampling. We've had ongoing discussions about whether this is something EPA would also request, and are currently thinking that the need to sample for 1,4-dioxane off-base could be justification for a simultaneous PFAS investigation.
A Community Advisory Council meeting was held on 12/10. The discussions during the meeting were not overly controversial, though community concerns remain regarding the PFAS and 1,4-dioxane sampling. They have told the community they will have more information at the next meeting, so that may be more interesting/controversial.
Sharon

From: Carpenter, Angela
Sent: Thursday, December 27, 2018 10:15 AM
To: Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>; Hartzell, Sharon <hartzell.sharon@epa.gov>; Pocze, Doug <Pocze.Doug@epa.gov>
Subject: RE: Brookhaven Private Well Survey
Generally FF can't sample off site without a basis to do so. That said, if we think that the 1,4 dioxane is our 'hook' then it might make sense to sample those wells/locations at least. The county and state have been looking for a very broad swath of sampling, and with the multiple potential sources of PFAS in the neighborhood, I certainly understand why BNL would be concerned. We should not sign on to any letter being issued by other parties. We are the primary oversight agency and have other options to exercise if needs be. Plus, we would need the RA's approval first.

From: Vaughn, Stephanie
Sent: Thursday, December 27, 2018 9:55 AM
To: Hartzell, Sharon <hartzell.sharon@epa.gov>; Pocze, Doug <Pocze.Doug@epa.gov>
Cc: Carpenter, Angela <Carpenter.Angela@epa.gov>

Subject: RE: Brookhaven Private Well Survey
Hi Sharon,
I discussed this briefly with Doug last week.
I am not familiar with all of the nuances and concerns associated with Federal Facility sites, but based on what I'm hearing, what if we take a sort of split down the middle approach.
Specifically, it sounds like we may not want to sign on to the letter formally that DEC prepares. However, once they issue it, we could indicate that we do not disagree with the approach. BNL has been conducting a stepwise investigation and, presumably, will continue to do so. However, the state is requesting they sample private wells ahead of finishing their investigation. Results from the private well sampling will provide additional information which can be reviewed in conjunction with BNL's more systematically obtained results, and provide another line of evidence for making decisions moving forward.
Does this make sense?
Thanks,
Stephanie

From: Hartzell, Sharon
Sent: Thursday, December 20, 2018 4:01 PM
To: Pocze, Doug <Pocze.Doug@epa.gov>
Cc: Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>; Carpenter, Angela <Carpenter.Angela@epa.gov>
Subject: Brookhaven Private Well Survey
Hi all,
Doug and I had a call this morning with the DEC and New York DOH to discuss the Suffolk County request for a private well survey in the vicinity of Brookhaven National Lab. DEC is planning to either sign onto a letter submitted by Suffolk County Department of Health Services requesting for BNL to perform the survey and wanted to find out whether EPA would also consider signing onto the letter or submitting one that echoes their request.
While we are concerned about drinking water we also want to make sure we are consistent with how these issues have been approached at other sites, which has been a stepwise investigation starting on base and moving off based on proximity of sources to receptors, etc. We're pursuing that angle with our in-work comments on BNL's Phase 3 sampling plan, requesting vertical profile wells at the boundary to determine presence of PFAS in the shallow aquifer. But, we also wanted to raise this request from DEC.
There are a few arguments that might back up a request for BNL to perform a private well survey. First, some of the discussions around a private well survey are related not only to PFAS but to 1,4-dioxane, which has been detected off base and is known to be from BNL and not from other sites in the area. In light of the new NYS proposed MCL for 1,4-dioxane and the presence of elevated samples off-base, the state and county will be putting requests in to BNL to conduct a private well survey for 1,4-dioxane. Since they will be going through the process anyway, would it make sense to test for PFAS simultaneously? Second – BNL has a good amount of public interest, and a very active community board, due to the high population density on Long Island, and the presence of a sole source aquifer. DEC shared today that they had an inquiry from Newsday about the PFAS investigation.
BNL is already ahead of the curve with respect to PFAS, and we want to be consistent… however, given the presence of off-site exceedances for 1,4-dioxane that will likely be spurring a private well

survey, and the high level of community involvement, could EPA sign on with DEC and Suffolk County to request the sampling?

Thanks for your thoughts,

Sharon

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"…so that those who live after may have clean earth to till." – J.R.R. Tolkien