UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

April 6, 2016

Honorable David B. Borge
Mayor, Village of Hoosick Falls
Municipal Building
24 Main Street
Hoosick Falls, NY 12090

Dear Mayor Borge:

Thank you for your letter of February 5, 2016. We appreciate the Village's cooperation as we continue to gather information about the perfluorooctanoic acid (PFOA) contamination in the groundwater in Hoosick Falls and the possible sources of that contamination. The U.S. Environmental Protection Agency (EPA) is working closely with the New York State Department of Environmental Conservation (DEC) and the New York State Department of Health (DOH) regarding the PFOA contamination problem in the Village and Town and is committed to ensuring the protection of public health and the environment in the community.

You asked a number of questions in your letter, some focused specifically on the authorities or processes of DEC or DOH. It is my understanding that the state agencies are speaking with you directly regarding those questions. Attached are EPA's answers to your questions pertaining to our role and authorities.

Regarding your recommendation that the agencies initiate a public education program to inform residents about the efficacy of granular activated carbon treatment and DOH's confirmatory testing, my understanding is that DOH has been providing such information to the community and will continue to do so. Finally, in response to your request that another meeting be scheduled in Hoosick Falls, involving EPA, DEC and DOH, we would be pleased to participate in such a meeting.

If you have any additional questions regarding EPA's work, please feel free to contact me at 212-637-5000 or contact Angela Carpenter of EPA at carpenter.angela@epa.gov or 212-637-4435.

Sincerely yours,

Judith A. Enck

Judith A. Enck
Regional Administrator

Enclosure

cc: Basil Seggos, NYSDEC
Howard Zucker, NYSDOH

Answers to Questions in February 5, 2016 Letter from Mayor of Hoosick Falls, NY

1. *Will there be coordinated review between the EPA and DEC during this investigation? What undertakings will each Agency be responsible for? Will one of the two Agencies be taking a lead in this effort?*

   Answer: EPA, DEC and DOH are coordinating with each other during the investigation and will continue to do so. DOH has the lead role with respect to confirming the effectiveness of the temporary and permanent treatment systems for the Village's public water supply, and DEC and DOH also have the lead role with respect to the evaluation of possible alternative water supplies for the Village. The State will also continue to have the lead with regard to the private well sampling and installation of point-of-entry treatment systems in the Town of Hoosick. Finally, the State and EPA have agreed that DEC will have the lead in investigating possible sources of PFOA contamination in the area, including locations on the west side of the Hoosick River.

   As you know, EPA sampled ballfields and park areas along Waterworks Road from February 15 to 19, 2016, and during the week of February 22-26, we collected soil samples in the Hoosick Falls Athletic Field near the ice rink and community pool. The results of these sampling efforts are described in EPA's Community Update No. 3 on our Hoosick Falls web page, http://www.epa.gov/aboutepa/hoosick-falls-water-contamination.

   Over the course of the next month or so, EPA will conduct groundwater sampling at and adjacent to Saint-Gobain's McCaffrey Street facility, and collect other water and soil samples at the facility. The purpose of this sampling is to gather information that will aid EPA in evaluating the site for possible inclusion on the Superfund National Priorities List (NPL). In addition, EPA, or a potentially responsible party under EPA's oversight, will conduct soil sampling on properties near the McCaffrey Street facility. This information will help us determine whether a cleanup action is needed in these areas in the short term. These sampling efforts are described in EPA's Community Update No. 4 on our Hoosick Falls web page.

   EPA and the State also expect that one or more of the potentially responsible parties will undertake a Remedial Investigation and Feasibility Study (RI/FS) at Saint-Gobain's McCaffrey Street facility, and other locations, under an administrative order on consent (AOC) issued by DEC. This study will be designed to determine the nature and extent of the contamination and any risks that it poses, and identify and evaluate remedial alternatives to address the contamination. EPA will have a consultative role with DEC as this study is developed and carried out, and EPA and DEC will work closely together during the remedy selection process.

2. *How will each Agency go about determining "other sites" in which an investigation is deemed necessary?*

   Answer: The determination of which locations need to be investigated will be based on a variety of sources of information, including sampling data, hydrogeological information, and information about past disposal activities or spills.

3. *Will this investigation go beyond the Town and Village political boundaries?*

Answer: While we do not presently expect that the site investigations will extend beyond the Town and Village political boundaries, the geographic scope of the studies may change as new data is obtained.

4. *Are there specific levels of detection for PFOA that are deemed unacceptable for water, soil and airborne sampling? What are they?*

Answer: We assume that this question is seeking information about what levels of PFOA in water, soil and air would be deemed to present unacceptable risks to human health or the environment – not the detection limits that can be achieved by analytical laboratories. Nationally, EPA is currently evaluating the available peer-reviewed science to develop a lifetime health advisory level for PFOA in drinking water, which the Agency expects to release in the spring of 2016. Health advisories identify the concentration in drinking water at which adverse health effects are not anticipated to occur over a lifetime or shorter periods of exposure. They provide federal, state, local and tribal governments with non-regulatory guidance to make decisions in cases involving an unregulated contaminant. When issued, the lifetime health advisory for PFOA will supersede the provisional health advisory of 0.4 parts per billion for PFOA issued in 2009.

Using currently available toxicity information, EPA calculated a site-specific action level for PFOA in soil of 15.6 milligrams per kilogram (parts per million). This value was developed to be protective of residents who might come in contact with contaminated soils in their yards. Soil action levels are chemical-specific concentrations for individual contaminants in soil that may warrant further investigation or site cleanup. EPA may revise the soil action value based on the Agency's final toxicity assessment for PFOA, when it is available. Additionally, EPA may choose to develop a soil action level that has been adjusted based on the use of a given property. For example, a soil action level for a recreational use (such as playing baseball) might be higher than for a residential use, since the exposure to contaminated soil in the former instance would be shorter in duration and the risk would be more limited. Soil values could also be adjusted based on site-specific information on soil type and other factors that would influence the migration of contaminants to groundwater.

EPA does not currently have a screening value for PFOA in air. However, because PFOA is not considered a volatile chemical, during the RI/FS, EPA expects that the focus will be on the most significant routes of exposure – ingestion of drinking water and exposure to soil contaminated with PFOA.

5. *Is it NYSDEC's policy or EPA's to obtain information from prior owners of the Saint-Gobain McCaffrey Street property? What happens if these prior owners cannot be located, or are unwilling to participate in the investigation? What steps does NYSDEC or EPA take to obtain information from prior owners of the property?*

Answer: EPA has the authority under federal law to require parties who may have information that would aid in the investigation of an environmental problem to answer questions and provide documents to the Agency. In this matter, EPA has sent such requests for information to both Saint-Gobain and Honeywell and has received information from both companies. DEC has sent requests for information as well. The agencies can take additional measures to obtain information, such as reviewing records and interviewing individuals who may have information.

6. *Now that the Saint-Gobain McCaffrey Street property is a State Superfund Site, is EPA still considering nominating the property for inclusion on the federal National Priorities List, as recommended by NYSDEC in its letter to EPA dated January 14, 2016? If EPA continues to consider the property for inclusion on the list, what steps will EPA take to involve local residents in its decision-making process?*

   Answer: As discussed in the response to Question 1, above, EPA continues to gather data and other information so that the Agency will be able to evaluate the Saint-Gobain McCaffrey Street facility, and potential releases from the facility, for possible inclusion on the NPL. The public will have the opportunity to comment on any NPL proposal, which will include the results of EPA's sampling activities.

7. *As EPA and NYSDEC continue their investigations, how can the community be protected from receiving contradictory information from the Agencies?*

   Answer: EPA is in regular communications with DEC and DOH regarding this matter. We will coordinate closely with the State to ensure that we provide the community with accurate information.

8. *Will either DEC or EPA attempt to place Saint-Gobain under a Consent Order? Is so, can the County Health Department, NYS Health Department and the Village have input into that process and possibly be signatories?*

   Answer: Please see the response to Question 1, above. Consistent with EPA policy and practice, it will not be possible for the County or State Health Departments or Village to be co-signatories of a consent order that EPA enters into with one or more of the potentially responsible parties. However, we will continue to have regular communication with the State and the Village regarding the site.