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March 6, 2025

Bonnie L.S. Parente, Mayor
Inc. Village of East Williston
2 Prospect Street
East Williston, NY 11596

Dear Mayor Parente:

I have received your letter dated February 25, 2025 and appreciate your feedback. I would like to offer a response to the points made in your letter. Please be aware that this letter, in order to be as accurate as possible, was put together with the assistance of both Bill Merklin and PJ Connell (D&B Engineers).

Treatment Technology

Firstly, I would like to address the question of why granular activated carbon (GAC) is being chosen over other technologies such as membrane filtration, reverse osmosis, and ion exchange. In March of 2024, the United States Environmental Protection Agency (EPA) published a guidance document (enclosed) which classifies GAC as a Best Available Technology (BAT) for PFAS removal, along with ion exchange and reverse osmosis/nanofiltration. Although each of the technologies is functional for this requirement, GAC is preferable for our system since it is already used nationwide, approved by the county and state health departments, and would be the quickest to implement.

A detailed alternatives analysis was performed by our engineer as part of the preliminary design process. This involved evaluating the above technologies, in addition to the possibility of drilling a new well. The results of this analysis concluded that GAC would be the best and most cost-effective path forward for our system.

Copies of the full reports prepared by our engineers for both treatment facilities are enclosed for your reference, as requested. Please note that these are preliminary reports and likely do not precisely reflect the final size and location of each building. For example, since the generation of the report for Wells 1A and 2, the proposed location of the facility has changed.

Maximum Contaminant Level

Next, I would like to address your comments regarding the maximum contaminant level (MCL). You correctly note in your letter that the MCL enacted by the EPA is 4.0 parts per trillion (PPT), and that the proposed GAC facilities would remove PFOA and PFOS down to non-detectable levels, thereby outperforming what is strictly required by the regulation. However, there are several issues with this point. For one thing, each of the BATs for PFAS removal would be designed to produce non-detect PFAS levels on the treatment effluent. This is the selected design criteria to provide a conservative design. Operation and monitoring of the system will ultimately dictate media exchange frequency.

Separate from that and perhaps more importantly, the EPA did not arbitrarily select 4.0 ppt as the MCL in 2024. In 2020, the EPA released health advisory levels (HALs) for PFOA at 0.004 ppt and PFOS at 0.02 ppt. HALs are “non-enforceable guidelines that identify the concentration of a contaminant in drinking water at which adverse health effects and/or aesthetics effects are not anticipated to occur over specific exposure durations.” The EPA also finalized health-based, non-enforceable Maximum Contaminant Level Goals (MCLGs) for PFOA and PFOS at 0.0 ppt.

The main reason that the MCL was not set at or closer to the HAL or MCLG is because laboratories are unable to detect down to 0.0 ppt. EPA Method 533 (a laboratory method for analyzing PFAS compounds) has a minimum reporting limit (MRL) of 4.0 ppt. An MRL is the lowest concentration of a compound that can be confidently detected and reported in a water sample. You will note that some of our PFAS data is reported at levels below 4.0 ppt, that is because some laboratories and laboratory methods have lower MRLs. However, the regulation is based on the above MRL which can be guaranteed by most labs. Given the spirit of the EPA regulations as indicated in the HAL and MCLGs, if labs could reliably detect down to lower concentrations, the enforceable MCL would most likely have been set at a lower limit.

Since the HALs and MCLGs fall below the detection limit, the EPA recommends that communities and water systems that measure any levels of PFOA or PFOS consider taking actions to reduce PFAS levels in their drinking water by installing treatment technologies or obtaining a new uncontaminated source of drinking water, if available. As noted above, our engineers explored the feasibility of obtaining a new source of drinking water but doing so would likely be just as costly as installing treatment at the existing facilities and there is no way to know whether the proposed new supply would require treatment as well.

It should also be noted that additional PFAS compounds have recently been regulated, including PFHxS and PFNA (though at 10.0 ppt, not 4.0 ppt). The Village has seen detectable levels of PFNA and PFHxS in all three of its active water supply wells, so it is reasonable to anticipate that treatment may also be required for these compounds in the future. Both of these compounds are also effectively removed by GAC.

In short, we recognize that historical PFOA and PFOS concentrations may not appear to be consistently in excess of the newly enacted MCL; however, based on guidance from the EPA, the Village has no choice but to conclude that the installation of treatment at each of its facilities is the best alternative at this time.

Capital Plan

Lastly, you had some questions about the capital projects that the Village is planning, as referenced in the rate study report. The proposed projects are as follows:

- Treatment at Wells 1A and 2
- Treatment at Well 4
- Supervisory Control and Data Acquisition (SCADA) system upgrades
 - Required to accommodate the installation of the new technology
- Lead Service Line Replacements
- Water Main Replacement
 - Required for routine distribution system maintenance
- Tank Rehabilitation and Interim Repairs
 - Required regardless of implementation of treatment

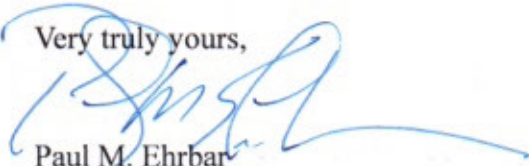
As you know, the rate study was performed to provide formal recommendations to the Village and is not being adopted into the Village Code. The 33% rate increase was proposed and is intended primarily to fund the debt service incurred by the two treatment plant projects. The other capital projects, as outlined above, have yet to be finalized in scope and will proceed on a separate track.

Enclosed for your review please find the EPA guidance document regarding Best Available Technologies for PFAS removal as well as engineering reports for both proposed treatment facilities.

Regarding your request to delay the rate increase, as you are aware, the Board approved the rate increase on February 24, 2025 to be effective March 1, 2025. Costs related to this project have already begun yet the full effect of the increase will not actually be realized until the fall. A delay has the potential of impacting both the designs and actual construction required for this development. While on the surface 2029 appears a long way off, with a project of this nature, especially in today's climate of material delays, the Village must move forward as quickly as possible.

If you have any further questions, please feel free to reach out.

Very truly yours,



Paul M. Ehrbar
Mayor, Village of Williston Park

cc: Deputy Mayor Anthony Gallo
Trustee James L. Iannone
Trustee Raffaella Dunne
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