



George Latimer
County Executive

Department of Health

Sherlita Amler, M.D.
Commissioner

April 23, 2018

Town Board, Town of New Castle
Honorable Robert J Greenstein, Town Supervisor
Honorable Lisa S. Katz, Deputy Town Supervisor
Honorable Jeremy Saland, Council Member
Honorable Hala Makowska, Council Member
Honorable Ivy A. Pool, Council Member

Re: Sunshine Children Home Public Water Supply Radium Levels
15 Spring Valley Road, Ossining, Town of New Castle, NY

Dear Supervisor Greenstein, Members of the Town Board:

The following serves as a collectively response on behalf of Westchester County and the Westchester County Board of Health.

The mission of the Westchester County Health Department (WCHD) is the protection of the health and welfare of the people who reside in or visit the county. One of the important objectives in fulfilling this mission is the availability of safe drinking water in the county. As a result, the WCHD rigorously enforces the requirements of the Federal Safe Drinking Water Act (SDWA) and the New York State Sanitary Code (NYSSC) for all Public Water Supplies in Westchester County to ensure that the drinking water distributed throughout the county complies with the quality and monitoring requirements of these regulations. The regulations are consistently and impartially applied to all public water supplies, including the Sunshine Children Home Water Supply (SCHWS), and require that timely and appropriate corrective actions be taken whenever water systems fail to comply with the regulations.

To address your questions/issues in the letter dated April 3, 2018, the WCHD offers the following responses:

What is the status of the violation that previously closed Well #3? How did WDOH address the violation? Was SCH required to take any corrective measures? If so, has WDOH verified that those measures were implemented?

- The Maximum Contaminant Level (MCL) for combined Radium was exceeded in the fourth quarter of 2015 at the SCHWS. The MCL for radium was not exceeded in the previous quarters and has not been exceeded since at SCHWS.

In February 2016, SCHWS was issued a violation for the fourth quarter of 2015 exceedance of the radium MCL. At that time, SCHWS was required to take immediate action to ensure that the water

provided to its customers complies with radium drinking water standards. SCHWS voluntarily removed Well #3 from operation. Subsequent monitoring results collected by SCHWS and provided to WCDH of the drinking water showed that the supply returned to compliance with radium requirements. SCHWS has three approved wells and all operational decisions regarding the sequence of operations of the three wells are made by SCHWS. WCHD did not close Well # 3.

What are WDOH's current water quality monitoring protocols at the SCH facility? How frequently is SCH's water quality tested and what procedures are followed?

- Routine radiological water quality monitoring is required quarterly. Sampling is collected at the Entry Point (after treatment and before first customer) to the distribution systems as required by the SDWA and NYSSC. This is the same requirement for all public water supplies, unless the water supply qualifies for reduced monitoring. The samples are collected by the New York State licensed and registered operator using sample bottles prepared and provided by a New York State approved laboratory. The samples are then returned to the laboratory for testing with a completed chain of custody form included.

However, with the operation of Well #3, WCHD has required additional sampling at the facility for the Entry Point and Well #3 to enable the water operator to effectively blend the water. This will remain in effect until SCHWS demonstrates continued consistent radium level in the water provided to customers.

What are the latest test results for Well #3?

- Public water supplies are not required by the SDWA or NYSSC to monitor source water (including wells) for radiological contaminants. The requirement is monitoring of the entry Point to determine actual exposure to customers. WCHD requires periodic monitoring of sources to aid public water supply operators in their source operation decisions. The results are not required for compliance determination. The latest test result for combined radium for samples collected from Well #3 at SCHWS on February 28, 2018 is 11.07 pci/L.

What assurances do staff, children and visitors at SCH have that they are not being exposed to dangerous amounts of radium in their water through the use of Well #3?

What procedures has SCH implemented to ensure that water from Well 3 is not consumed inadvertently? Did SCH seek guidance from WDOH regarding such procedures? Has WDOH inspected the facility to verify the efficacy of such procedures?

Can water that is non-potable due to the presence of elevated radium levels nevertheless be safely used for washing, cleaning and other activities? What is the generally accepted level of radium for such purposes?

- In November 2017, SCHWS returned Well #3 into operation and indicated that blending with water from Well #2 would be used to control the radium levels in the drinking water distributed to its customer. Consequently, WCHD required that SCHWS provide controls for the flow from Well #3. To achieve this, the pump in Well #3 was replaced with a pump of lower capacity and a flow control valve was installed to allow for controlled blending. Further, Well #3 was interlocked with Well #2 and will only operate in combination with Well #2. This ensured that SCHWS could consistently and reliably provide water that complies with radium quality requirements to its customers. Subsequent sample test results for radium have remained below the MCL in the water distributed to customers at SCHWS. WCHD approved and inspected the modifications made to Well #3. Non-potable water has not been distributed to customers at SCHWS. The decision to provide bottled water for consumption was made solely by SCHWS. This was not required by WCHD since the drinking water provided to customers of SCHWS has been in compliance with regulatory requirements for radium except for the fourth quarter of 2015 as previously indicated.

Does WDOH have any reason to believe that the deepening of Well #1 to increase its yield could negatively impact the water quantity and quality available from the private wells of area residents? Could this action negatively impact (the recharging of) Indian Brook Reservoir?

- The deepening of a well will not affect the yield of that well if the well remains in the same aquifer. In addition, the water withdrawal rate from the deepened well will remain the same if the well pump is unchanged. However, changes in the depth of the well could negatively or positively affect the quality of the water withdrawn from that well. Therefore, any modification to a well, including the modifications to Well # 1 at SCHWS that could affect the yield or quality of water from the well requires (i) a 72-hour pump test to determine yield, (ii) monitoring of nearby wells to determine potential impact and (iii) water sample testing to determine quality of the water, before the modified well can be returned to service. An increase in the depth of the well at SCHWS will have negligible impact on the quantity or quality of water available to private wells. The yield of the Indian Brook Reservoir is a million gallons per day so the modifications of SCHWS well # 1 will have negligible impact on the reservoir.

How will WDOH verify the safety of SCH's drinking water if/when Well #3 is once again used as a source of potable water? After all, nobody wants to see unsafe water consumed for even one day, let alone have an unsafe condition persist for weeks or more. In short, we believe there is no margin for error when it comes to the safety of drinking water in our community.

- WCDH works to ensure that all drinking water is in compliance with regulations for radium. The modifications to Well #3 indicated above will ensure that SCHWS continues to consistently and reliably provide water that complies with radium quality requirements to its customers. In addition, SCHWS will continue to perform quarterly monitoring for radium levels at its entry point and the health department will continue to perform routine inspections of the water facilities.

WCHD has not received an application, a report or any specifications from SCHWS regarding any radium removal system at their water facility and therefore cannot provide any information on such system.

The water is in compliance with the NYS Sanitary Code and the Safe Drinking Water Act for radium. With the exception of the fourth quarter of 2015, SCHWS has been, and continues to be, in compliance with the MCL levels for radium in accordance with the SDWA and NYSSC.

Respectfully,

Shulita Amble, M.D.

Cc: Robert Baker, MD, Board President
George Latimer, County Executive
Joan McDonald, Director of Operations
Ken Jenkins, Deputy County Executive
John Nonna, County Attorney