

Subject: Aquifer Contamination Update

Date: July 22, 2026

We have lost a significant part of our only supply of fresh water in the Town of East Hampton. For how long—months, years, decades—we do not know. Without access and confidence in a ready supply of fresh drinking water, how long before people stop coming to East Hampton? What will happen to property valuations? Please read in full (2 pages).

Dear Residents:

The Suffolk County Department of Health Services (SCDHS) released test results for monitoring wells immediately north of public supply wells for the Village of East Hampton less than 2,500 feet downgradient (south) of the East Hampton battery storage facility (destroyed by fire in May 2023). The test results show PFOS and PFOA contamination of 2,774 and 13 parts per trillion (ppt), respectively, exceeding the EPA National Primary Drinking Water Regulation (4 ppt) by 694 times and 3 times, respectively.^[i] See SCDHS Well Maps #1 and #2 (attached). Also, read “High Levels of Toxins in Test Wells” by Mark Harrington, Newsday (July 17, 2026) (attached).

The level of PFOS (2,774 ppt) north of SCWA’s public supply wells is more than double the highest level of PFOS (1,010 ppt) recorded south of East Hampton Airport in Wainscott. See Airport PFAS Satellite Map (attached). The two sources of PFAS contamination, the East Hampton battery facility and the Airport, both converge on Georgica Pond. See PFAS Map (Georgica Pond) (attached).

The levels of PFOS and PFOA, although disturbing, pale in comparison to the recently detected level of ultra-short chain PFPrA of **1,700,000 ppt** (SCDHS Well Map #2, Eurofins BRWF26-1),^[ii] which exceeds the NYS Department of Health’s (preliminary) PFPrA drinking water screening level by 567 times, and the NYS Unspecified Organic Contaminant Maximum Contaminant Level (MCL) by 34 times.^[iii]

We know PFOA and PFOS contaminants in our sole-source aquifer are carcinogenic (PFOA) and possibly carcinogenic (PFOS) to humans,^[iv] among other adverse health effects,^[v] but there is not enough information to confidently project a future MCL for the ultra-short PFPrA. (NB: One should *not* interpret the limited scientific research on PFPrA as evidence of no adverse health effect.) The NYS Department of Health (preliminary) screening level of 3,000 ppt and the extrapolated PFPrA MCL (based on GenX) of 1,000 ppt^[vi] put SCDH’s extremely high detection of **1,700,000 ppt** into perspective.

NB: In response to the excessive levels of contamination, SCWA swiftly took all four wells out of service, reserving the least contaminated (Well No. 4) for last-call emergency use only.

Residents may underappreciate the gravity of the situation. Due to poor decisions that failed to consider verifiable analysis provided to East Hampton Town Supervisor Kathee Burke-Gonzalez and Councilwoman Cate Rogers in January 2024, SCWA was forced to take ~8% of its groundwater capacity for *the South Fork* (SCWA Zone 23), or an estimated 15-20% of its capacity

for the Town of East Hampton,^[vii] out of service due to extremely high concentrations of '*forever chemicals*.'

PFPrA's "overall environmental persistence is high [and] [i]ts mobility in soil and water suggests a potential for widespread contamination of aquatic systems."^[viii] Furthermore, SCWA cannot remove PFPrA using its primary groundwater treatment method, Granulated Activated Carbon. In other words, we have lost a significant part of our *only* supply of fresh water. For how long—months, years, decades—we do not know. Without access and confidence in a ready supply of fresh drinking water, how long before people stop coming to East Hampton? What will happen to property valuations?

Although Supervisor Kathee Burke-Gonzalez is asking residents to conserve water, and we should, she cites *only* a drought as the reason, not the loss of ~15-20% of our groundwater resources south of the battery storage facility to extreme levels of highly mobile and recalcitrant contamination.

Questions remain unanswered.

- Q1. Why will the battery facility in Montauk not go up in flames and contaminate Montauk's sole-source aquifer in the same way the fire at the East Hampton facility did?
- Q2. Will the East Hampton facility catch fire again? If not, why not?
- Q3. Do the facilities have closed-loop submersion water cooling systems to suppress the heat and fire in case of another thermal runaway (chain-reaction fire)?
- Q4. Is there containment of fire extinguishing water in the East Hampton and Montauk facilities sufficient to protect groundwater resources in case of another chain-reaction fire?
- Q5. What toxic substances are stored in the East Hampton and Montauk battery facilities and how much, precisely?
- Q6. Is there an evacuation plan in case of hydrogen fluoride gas emissions, which can be fatal over 170 ppm?
- Q7. Can South Hampton Hospital treat patients suffering from exposure to hydrogen fluoride gas? If not, where is the closest hospital that can, and how do patients get there in an emergency?
- Q7. Have fire and police departments been adequately trained for potential hydrogen fluoride gas emissions?
- Q8. Have private wells at and south of East Hampton Airport in Wainscott been tested for PFPrA?

In the three years since the fire at the East Hampton battery facility, the Town has not provided answers to these questions concerning our groundwater and health. Why not?

Had there been a full and transparent environmental review *before* the Town approved the two battery storage facilities, we might have avoided losing ~15-20% of the capacity and access to our sole-source aquifer due to extreme levels of contamination.

Will we have an open and transparent environmental review now, where the public can review and comment on the evidence?

A question of accountability— Why did Supervisor Kathee Burke-Gonzalez refuse to test the groundwater after I brought the inevitability of PFAS groundwater contamination from the battery facility fire to her attention in January 2024, when there was an opportunity to mitigate the release of toxic chemicals? Instead, months later, Kathee Burge-Gonzalez, Cate Rogers, and the Chair of the Wainscott Citizens' Advisory Committee, Carolyn Logan-Gluck, successfully lobbied to keep me off the WCAC in an ongoing effort to discredit me for presenting research and facts concerning our environment and health. The WCAC has never told me why, for the first time in its 40-year history, it rejected my application to rejoin the WCAC six years after I was removed from the committee (in 2018) by then-Councilwoman Kathee Burke-Gonzalez, the liaison to the WCAC at the time. The Town and the WCAC should *not* single out *any* resident for making a good faith effort to study and present verifiable factual information in a public meeting. Please read my letter to the WCAC (Dec 12, 2024) (attached).

Sincerely yours,
Si Kinsella

See footnotes (below).

[i] PFOS: Perfluorooctanesulfonic Acid

[ii] PFPrA: Perfluoropropanoic Acid

[iii] In NYS, the extremely high levels of perfluoropropanoic acid (PFPrA) fall within the general drinking water standard (i.e., *non-contaminant-specific*), the Unspecified Organic Contaminant Maximum Contaminant Level of 50 parts per billion (ppb) (50,000 ppt). Since there is no *contaminant-specific* drinking water standard or guidance value for PFPrA, the NYS Department of Health has developed a preliminary PFPrA screening level of 3 ppb (3,000 ppt) in drinking water. NYS and Suffolk County authorities will use the new PFPrA screening level for assessing health risks and actions to address PFPrA in private and public wells during the East Hampton investigation. For further information, see https://health.ny.gov/environmental/investigations/east_hampton/east_hampton.htm.

[iv] The World Health Organization (WHO) International Agency for Research on Cancer (IARC) classifies PFOA as "carcinogenic to humans" (Group 1), meaning there is convincing evidence that PFOA can cause cancer in humans, and classifies PFOS as "possibly carcinogenic to humans" (Group 2B), meaning that there is strong evidence that PFOS can induce key biological changes (like immunosuppression) that are related to cancer development

[v] According to the EPA, studies indicate that exposure to PFOA and PFOS over certain levels may result in adverse health effects, including— Developmental effects to fetuses during pregnancy or to breastfed infants (e.g., low birth weight, accelerated puberty, skeletal variations), Cancer (e.g., testicular, kidney), Liver effects (e.g., tissue damage), Immune effects (e.g., antibody production and immunity), Thyroid effects, and other effects (e.g., cholesterol changes). See EPA PFAS Fact Sheet (800-F-16-003), released May 31, 2016 (although dated November 2016) at— https://www.epa.gov/sites/production/files/2016-06/documents/drinkingwaterhealthadvisories_pfoa_pfos_updated_5.31.16.pdf

[vi] On August 1, 2023, the EPA Office of Research and Development published a human health toxicity value for PFPrA with a calculated non-cancer chronic reference dose (RfD) of 0.0005 mg/kg per day. Using the final chronic RfD for GenX (0.000003 mg/kg bw-day), which is two orders of magnitude lower than that of PFPrA, suggests a much higher potential threshold for a future PFPrA MCL. The MCL for GenX is 10 ppt, and two orders of magnitude would suggest a PRPrA MCL of more than 1,000 ppt (NB: currently these assumptions are only speculation). See Cape Fear Public Utility Authority Overview of PFPrA (attached). Also available online at— www.CFPUA.org/DocumentCenter/View/15390/PFPrA-White-Paper-8-3-23.

[vii] Estimate based on population.

[viii] See BenchChem, Environmental Fate of PFPrA: A Technical Guide (at 8), available online at—
https://pdf.benchchem.com/52/Perfluoropentanoic_Acid_PFPeA_An_In_depth_Technical_Guide_on_its_Role_as_an_Environmental_Contaminant.pdf

Suffolk County
Department of Health Services
Bridgehampton Wellfield
Groundwater Investigation
PFOS & PFOA and
Ultra-Short-Chain (PFPrA & TFA)
PFAS Sampling Results to Date
June 2026

Battery Storage
Site Fire
May 23, 2023

BRWF26-3				
Sample Interval (ft)	PFPrA* ppb	TFA* ppb	PFOS^ ppt	PFOA^ ppt
25-30	0.45	3.23	9	5
35-40	896	0.48	<2	3
45-50	320	0.23	607	3
55-60	24.3	0.046	2,774	13
65-70	0.055	0.043	855	3
75-80	<0.025	0.22	1,214	7
85-90	<0.025	<0.025	49	6

BRWF26-2				
Sample Interval (ft)	PFPrA* ppb	TFA* ppb	PFOS^ ppt	PFOA^ ppt
25-30	0.94	0.11	<2	5
35-40	317	1.63	<2	4
45-50	1,080	0.39	2	<2
55-60	302	0.17	<2	<2
65-70	1.51	0.13	<2	<2
75-80	0.031	0.66	<2	<2
85-90	0.038	0.21	<2	<2

BRWF26-1				
Sample Interval (ft)	PFPrA* ppb	TFA* ppb	PFOS^ ppt	PFOA^ ppt
25-30	2.03	0.78	<2	2
35-40	1,170	0.73	<2	<2
45-50	962	0.18	<2	4
55-60	42.1	0.49	3	4
65-70	1.42	0.40	6	11
75-80	0.29	0.25	<2	7

BRWF26-4				
Sample Interval (ft)	PFPrA* ppb	TFA* ppb	PFOS^ ppt	PFOA^ ppt
35-40	44.6	0.081	<2	<2
45-50	28.1	0.56	<2	4
55-60	15.9	0.042	2	3
65-70	0.60	0.03	3	4
75-80	<0.025	0.48	3	4
85-90	<0.025	0.20	4	10

SCWA
Bridgehampton Rd
Wellfield

Legend
SCDHS Profile Well
Regional Groundwater Flow Direction
Red indicates exceedance of a NYS drinking water standard
0 500

US Survey feet

Note: * Ultra –Short-Chain Analysis by Suffolk County Water Authority (SCWA) Laboratory
^ PFAS Analysis USEPA 1633 by Long Island Analytical Laboratory

Suffolk County
Department of Health Services
Bridgehampton Wellfield
Groundwater Investigation
Ultra-Short-Chain (PFPrA & TFA)
SCWA & Eurofins Data
PFAS Sampling Results
SCDHS Temporary Profile Wells

Battery Storage
Site Fire
May 23, 2023

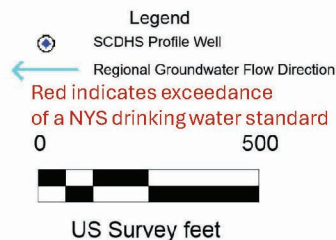
BRWF26-3				
SCWA		Eurofins		
Sample Interval (ft)	PFPrA* ppt	TFA* ppt	PFPrA+ ppt	TFA+ ppt
25-30	450	3,230	1,300	4,300
35-40	896,000	480	1,500,000	<20,000
45-50	320,000	230	470,000	<20,000
55-60	24,300	46	29,000	<20,000
65-70	55	43	71	510
75-80	<25	220	29	370
85-90	<25	<25	53	250

BRWF26-2				
SCWA		Eurofins		
Sample Interval (ft)	PFPrA* ppt	TFA* ppt	PFPrA+ ppt	TFA+ ppt
25-30	940	110	1,100	1,600
35-40	317,000	1,630	390,000	NA
45-50	1,080,000	390	1,400,000	3,000
55-60	302,000	170	450,000	1,300
65-70	1,510	130	2,100	1,800
75-80	31	660	35	1,300
85-90	38	200	42	710

BRWF26-1				
SCWA		Eurofins		
Sample Interval (ft)	PFPrA* ppt	TFA* ppt	PFPrA+ ppt	TFA+ ppt
25-30	2,030	780	2,400	2,800
35-40	1,170,000	730	1,700,000	3,000
45-50	962,000	180	1,300,000	2,300
55-60	42,100	490	82,000	1,200
65-70	1,420	400	1,700	1,300
75-80	290	250	350	780

BRWF26-4				
SCWA		Eurofins		
Sample Interval (ft)	PFPrA* ppt	TFA* ppt	PFPrA+ ppt	TFA+ ppt
35-40	44,600	81	59,000	<20,000
45-50	28,100	560	34,000	<20,000
55-60	15,900	42	27,000	<20,000
65-70	600	30	1,400	800
75-80	<25	480	<5	590
85-90	<25	200	8.2	400

SCWA
Bridgehampton Rd
Wellfield



Note: * Ultra –Short-Chain Analysis by Suffolk County Water Authority (SCWA) Laboratory
+Ultra –Short-Chain Analysis by Eurofins (SCWA Contract Laboratory)
NA = Not Analyzed

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Remembering Flight 800, 30 Years Later

Liers, family
members share
their stories

A6-8 | VIDEO AT NEWSDAY.TV



A truck moves the reconstructed wreckage from a Calverton hangar.

NEWSDAY, 1999 / DICK KRAUS

Trump Questions Past Elections In Speech to Nation

Releases formerly
classified documents,
offers no proof
outcomes were altered

A2

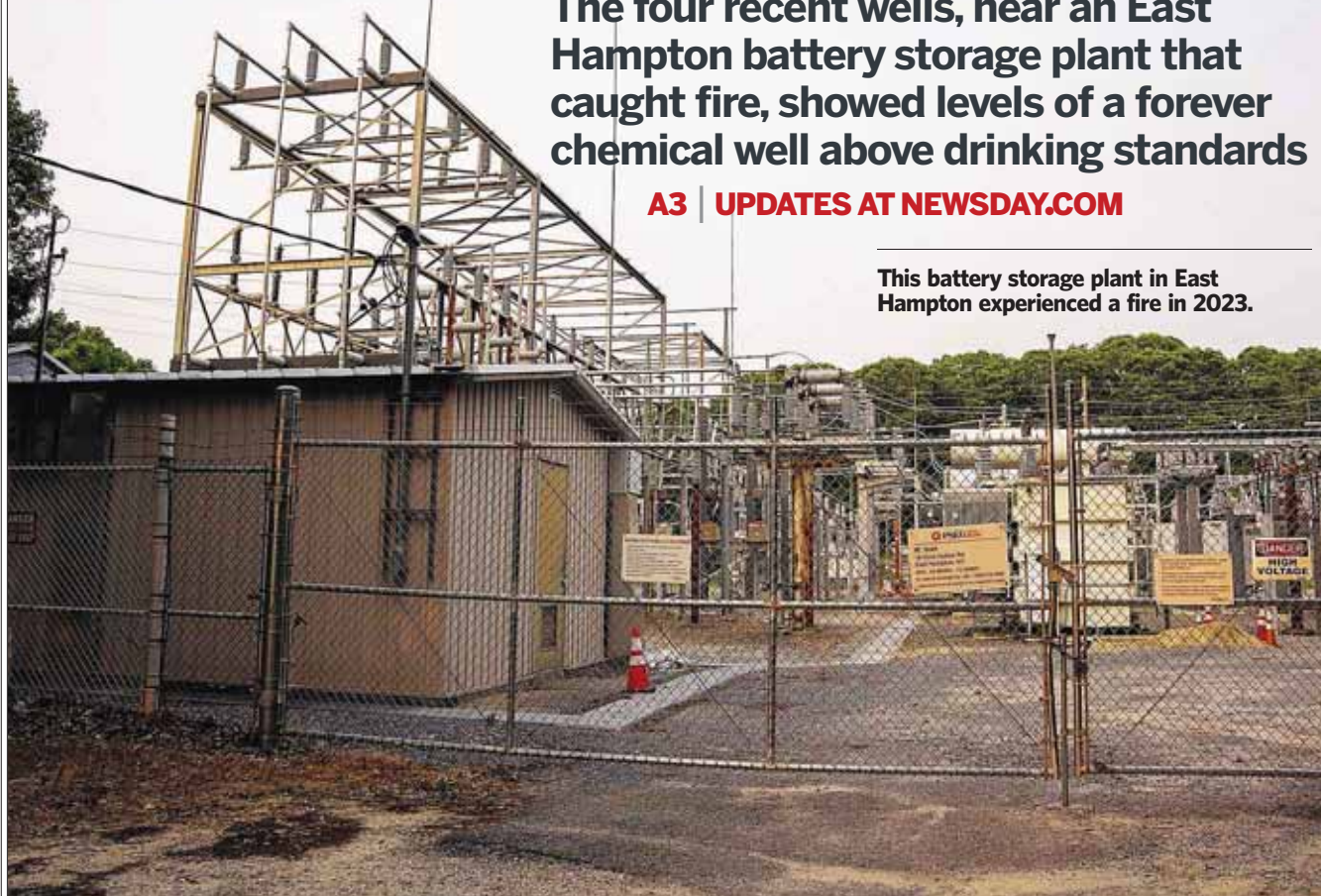
ONLY IN NEWSDAY

HIGH LEVELS OF TOXIN IN TEST WELLS

The four recent wells, near an East Hampton battery storage plant that caught fire, showed levels of a forever chemical well above drinking standards

A3 | UPDATES AT NEWSDAY.COM

This battery storage plant in East Hampton experienced a fire in 2023.



THOMAS HENGGE

FIRST IN NEWSDAY

AMAZON PLANS \$1B COMPLEX IN HOLBROOK

A10

FOREVER CHEMICALS IN LI WELLS

Toxic plume found after 2023 battery storage plant fire

ONLY IN NEWSDAY

BY MARK HARRINGTON

mark.harrington@newsday.com

The most recent test wells just south of a battery storage plant in East Hampton have shown levels of a forever chemical at more than 1 million parts per trillion, raising questions about the extent of contamination from the plant.

Newsday on Wednesday received a copy of the latest report after tests conducted by Suffolk County earlier this month. It showed extremely high detections that are well above drinking water standards of the toxin, known as ultrashort-chain PFPrA, at the test wells. Around 30 residents have private wells in the area, and not all have been tested yet.

Suffolk said tests at private homes have not yet shown the toxin above drinking water standards, but noted the plume is moving southward and “there’s always a concern” it could, said Andy Rapiejko, associate hydrogeologist for the Suffolk Health Services Department. “We don’t know unless we test.”

Impact of plume

The toxic plume has already affected public drinking water wells around 2,500 feet south of battery plant, which experienced a thermal-runaway fire in 2023 that was treated with more than 2.2 million gallons of water. Soot-impacted water pooled off-site. The test wells are just north of public wells operated by the Suffolk County Water Authority.

Suffolk County has tested the water from nine private wells around the plume. Thus far, the tests haven’t shown the specific chemical above the 50,000 parts per trillion standard, Rapiejko said.

Levels of the toxic compound at the separate Suffolk test wells were found to be as high as 1.7 million parts per trillion in one sample, and 1.08 million parts per trillion in another’s home’s



THOMAS HENGGE

A lithium-ion battery storage facility in East Hampton. Tests of some nearby wells show high levels of forever chemicals from a toxic plume.

WHAT NEWSDAY FOUND

■ **Recent tests of private wells just south of a battery storage plant in East Hampton** have shown extremely high levels of a forever chemical at more than 1 million parts per trillion at several homes.

■ **A copy of the latest private well report after tests** conducted by Suffolk County earlier this month showed detections that are well above drinking water standards of the toxin, known as ultrashort-chain PFPrA, at four homes.

■ **The toxic plume has already affected public water wells** around 2,500 feet south of battery plant, which experienced a thermal-runaway fire in 2023.

sample. There were also separately high readings of PFOS and PFOA at two of the wells, according to the data.

Justin Hogan, an East Hampton resident who lives across the street from a test well that showed the highest levels, called the figures “ridiculous.”

He’s on public water, but said, “If we have a toxic plume underneath this property, I don’t know what it does to the property values.”

The plume is the subject of a federal lawsuit filed by the Suffolk water authority, which was forced to shut down or sharply restrict those drinking water wells because of the discovery of the forever chemicals in the water. Those closures have heightened a water shortage in the Hamptons at the height of the summer season.

In responses to Newsday on Thursday, water authority spokesman Dan Dubois said two partially impacted public wells are on restricted use and neither has been used for drinking water since at least late June.

One well is in “restricted status and has not been run since June 26th. Well 4 is out of service as we await new sample results,” Dubois wrote in responses to Newsday. Two other wells have been off since the spring. The county has not yet released test results from those wells.

Earlier this week, the authority declared a Stage 1 water alert on the East End, because of a drought and record use, but also because the four East Hampton wells are essentially out of service.

Gov. Kathy Hochul, who has long advocated for the battery plants, doubling the state mandate for them to 6,000 megawatts by 2030, in 2023 declared there were “no harmful levels of toxins detected” at the East Hampton site and two oth-

ers that experienced fires that year. A state task-force analysis at the time, she said, “shows no notable lasting impacts on the health or safety of the first responders or the communities they serve.”

Hochul spokesman Ken Lovett previously has said while the governor can’t comment on the litigation, she “immediately” reconvened her interagency fire-safety working group “on becoming aware of the situation,” and the State Departments of Health and Environmental Conservation “are investigating any potential impacts to water quality.”

Since been rebuilt

East Hampton Village Mayor Jerry Larsen is calling for quicker and more decisive action. “My concern is what is the plan with this plant?” he said. “This could happen again tomorrow and we’d have the same results.”

The battery plant has since been rebuilt and restored to operation in 2024. Another battery facility in Montauk has also undergone redesigns, Newsday has reported. Both are under contract to LIPA.

Larsen said, “I think we should shut it down until we know there’s some sort of [water] containment plan for this plant” in the event of another fire. “I think we shut down this

one and the one in Montauk until we know there’s a plan.”

The owner of the sites, National Grid and its battery partner NextEra, have declined to comment on the topic, citing the pending litigation, though NextEra spokesman Chris Curtland has previously said, “. . . we stand ready to work with county and state agencies on any further actions that require our assistance.”

The state Department of Environmental Conservation, which did not order groundwater testing in 2023 because soil tests didn’t show conclusive impacts and closed its investigation of the site in 2024, didn’t immediately respond to Newsday questions about the latest Suffolk test results.

DEC has previously said it is developing a work plan for the site, one including new rounds of water tests and an investigation of all possible causes of the plume. DEC said it plans to release a report on the site by late summer or early fall.

At a meeting Monday of state and local officials about the plume, the DEC told attendees it expects to have a contractor on site by Friday, with drilling of up to eight wells to begin sometime next week, according to an official who attended who asked not to be identified. Results could be available in a month.

Wells EH-19A, EH-19B1 and EH-1
PFAS contamination data provided by New York State Department of Environmental Conservation ("DEC"): Site Characterization Report, East Hampton Airport (dated November 30, 2018).

Exhibit C

Sample: **WSG-MW-6-10-0**
Date: **11/6/2019**
Depth (ft): **6**

Perfluorobutanesulfonic Acid (PFBS)	2.5
Perfluorodecanoic Acid (PFDA)	92.3
Perfluoroheptanoic Acid (PFHpA)	50
Perfluorohexanesulfonic Acid	58.9 B
Perfluorohexanoic Acid (PFHxA)	61.1
Perfluorononanoic Acid (PFNA)	2850
Perfluorotridcanoic Acid (PFTriA)	1.49 J
Perfluoroundecanoic Acid (PFUnA)	333
Perfluorooctane Sulfonic Acid (PFOS)	151
Perfluorooctanoic acid (PFOA)	26.1
Total PFOA and PFOS	177.1
Total PFAS	3626.39

EH-19A		
Analytes	Concentration (ng/g)	
	5/4/2018	
	0-1'	31-32'
Perfluorooctane sulfonic acid (PFOS)	3.9	.18 U
Perfluorooctanoic acid (PFOA)	.18 U	.19 U

EH-19B1		
Analytes	Concentration (ng/g)	
	8/9/2018	
	0-1'	
Perfluorooctane sulfonic acid (PFOS)	12	
Perfluorooctanoic acid (PFOA)	3.8	

EH-1		
Analytes	Concentration (ng/g)	
	5/1/2018	
	0-1'	32-33'
Perfluorooctane sulfonic acid (PFOS)	10	.19 J
Perfluorooctanoic acid (PFOA)	.18 U	.18 U

EH-19A1

EH-19A

EH-19A2

EH-19B

EH-19B1

EH-1

Well EH-1 - Soil
PFOS Contamination
15,000 ppt (or 15 ng/g Duplicate)

Groundwater Flow

MW-6

Sample: **WSG-MW5-13-0**
Date: **11/7/2019**
Depth (ft): **13**

Perfluorobutanesulfonic Acid (PFBS)	4.58
Perfluoroheptanoic Acid (PFHpA)	2.95
Perfluorohexanesulfonic Acid	566 B
Perfluorohexanoic Acid (PFHxA)	12
Perfluorononanoic Acid (PFNA)	1.64 J
Perfluorooctane Sulfonic Acid (PFOS)	877
Perfluorooctanoic acid (PFOA)	69.4
Total PFOA and PFOS	946.4
Total PFAS	1533.57

MW-5

MW-3

Wainscott Sand and Gravel Wells MW-5, MW-3 and MW-4
PFAS contamination data provided by New York State Department of Environmental Conservation ("DEC"): Site Characterization Report, Wainscott Sand and Gravel, site 152254, dated July, 2020 (page 90 of 631)

Sample: WSG-MW3-10-0		
Date: 11/7/2019		
Depth (ft): 10		
Perfluorobutanesulfonic Acid (PFBS)	3.66	
Perfluoroheptanoic Acid (PFHpA)	2.27	
Perfluorohexanesulfonic Acid	306 B	
Perfluorohexanoic Acid (PFHxA)	9.53	
Perfluorononanoic Acid (PFNA)	2.2	
Perfluorooctane Sulfonic Acid (PFOS)	1010	
Perfluorooctanoic acid (PFOA)	27.5	
Total PFOA and PFOS	1037.5	
Total PFAS	1361.16	

South For Wind
Proposed Construction Corridor

MW-4

Sample: WSG-MW4-10-0		
Date: 11/7/2019		
Depth (ft): 10		
Perfluorobutanesulfonic Acid (PFBS)	2.11	
Perfluoroheptanoic Acid (PFHpA)	1.09 J	
Perfluorohexanesulfonic Acid	43.4 B	
Perfluorohexanoic Acid (PFHxA)	5.06	
Perfluorononanoic Acid (PFNA)	0.8 J	
Perfluorooctane Sulfonic Acid (PFOS)	232	
Perfluorooctanoic acid (PFOA)	5.57	
Total PFOA and PFOS	237.57	
Total PFAS	290.03	

Mass Casualty and Fire Training Exercises

TOWNLINE ROAD (EH APT) WELL FIELD

Airport Emergency Accidents

STEPHEN HANDS PATH WELL FIELD

South Fork Wind Interconnection Facility
(former SFW PFAS Hazardous Waste Treatment Facility)
and East Hampton Energy Storage Center

Airport Fire Truck Facility

Airport Fire Training Facility

Groundwater Flow Direction

SCWA Bridgehampton Rd Well Field

Groundwater Flow Direction

SOUTH FORK WIND
Underground Concrete Infrastructure
for High Voltage Transmission Cables

3A (S-120485)
4 (S-49422)
2B (S-120485)
5A (S-131191)

Well No. 1
Well No. 2

500 ft

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M (631) 903-9154

December 11, 2024

Carolyn Longan-Gluck, Chair
Wainscott Citizens' Advisor Committee
Wainscott, NY 11975

via email only

Re: Wainscott Citizens' Advisor Committee

Dear Carolyn and WCAC members,

As you know, I recently requested to rejoin the Wainscott Citizens' Advisory Committee ("WCAC") and provided background information per the nominating committee's request (attached). At the recent WCAC meeting (December 7), for the first time in its history, the committee voted *against* someone joining the committee even though that person had been serving Wainscott truthfully and with dedication since 2016 and continues to do so. Certain WCAC members (most) concealed their motives behind closed doors in deliberations immediately before the public vote. The WCAC then voted and singled out just one person (in its forty-year history) apparently of such poor character as to warrant refusing membership *without giving a reason*.

I need not remind the WCAC that it is a public body representing the views and interests of those who live in Wainscott. After all, the *Wainscott Citizens' Advisory Committee* represents *Wainscott citizens*. Therefore, its decisions carry a presumption of community support, and its decision to censure me in public at the Wainscott Chappel (that will have to be recorded in the public minutes) carries the weight of that presumption. Thus, besides the committee members who voted against me, it is presumed that *my fellow residents, neighbors, and friends* whose interests I have advanced over the years also agree with whatever the (undisclosed) reason is for the WCAC's public rebuke. It also raises the uncomfortable question of why the WCAC is so afraid to disclose its motive behind voting *against* a Wainscott resident.

It has been seven years since the Town Board effectively dismissed me from the committee (on January 2, 2018).¹ Then, Councilwoman Burke-Gonzalez (the outgoing WCAC Town Board liaison) and the Town Board refused to explain why it publicly reprimanded me; it left it to rumor and speculation that it subsequently stoked. The Town Board has *never* spoken with me about the matter. In my request to rejoin the WCAC, I explained that in 2018, "[t]he Town Board spoke with neither co-chair of the WCAC (Barry Frankle or Susan Macy) nor any other WCAC member. No one had spoken with me before or since publishing the approved WCAC membership list for 2018, with my name conspicuously left off. The Town Board dismissed me without cause, consultation, redress, notification, or the pretense of a plausible excuse. My dismissal was based on rumors." Now, seven years later, the WCAC continues what the Town Board started in 2018, but worse. This time, *my own community voted against me and is concealing the reason* for doing so. Thus, the WCAC, purportedly acting on behalf of the Wainscott community, my neighbors, and friends, continues to provide grounds for further rumor and speculation, which is prone to adverse influence.

The WCAC knows I cannot defend myself against undisclosed accusations it conceals. Now, there will always be an open question in the air—What did Simon Kinsella do to deserve to be thrown off the WCAC in 2018 and denied again *by his own neighbors* in 2024? As such, the WCAC's public rebuke, but with hidden motives, is abusive.

¹ See Town Board Resolution RES-2018-63, with my name conspicuously left off the list despite the fact that the Wainscott Citizens' Advisory Committee had nominated me to serve for another year (2018).

Although WCAC Chair Carolyn Logan-Gluck called me the night before, when I asked her (twice) why she would not support my becoming a member (which is her right), she refused to say. Carolyn indicated that she had spoken with other members when telling me she “is not alone.”

The WCAC’s vote sends a clear message that I am of such deficient character to be unworthy of WCAC membership, which causes harm.

Furthermore, the WCAC’s actions have a chilling effect on open public discourse and free speech. The natural and probable consequences of the WCAC knowingly concealing the reasons for its public decision, which denies me specifics I might challenge, leave unanswered questions that undermine my integrity *in my own neighborhood*.

In December 2016, the WCAC honored me with the Most Valuable Person award. In January 2018, the committee agreed to ask its new Town Board liaison, Councilman Bragman, to ask his fellow board members to reconsider their decision not to reappoint me. In other words, the WCAC supported me in 2018 when the Town Board did not. The WCAC has never questioned my years of service advancing Wainscott’s interests, nor has it disputed the accuracy of my many reports. Four reports on water quality (two on PFAS contamination and two on Wainscott Pond); one report on South Fork Wind that resulted in it changing the burial depth of its transmission cable (from 10 to 30 feet below the beach); a report on scenic vistas titled Vanishing Beauty that preceded Jeff Bragman’s brilliant work restoring our viewsheds; among other efforts, such as leading the opposition against the proposed car wash, now Rick Del Maestro Memorial Park.

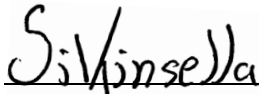
You will remember that *the WCAC* asked me to investigate water quality (2016) and assess the then-proposed offshore wind farm and transmission route through Wainscott (2017). Still, its recent vote undermines the integrity of my reports and casts a dark shadow over my years of work, signaling the WCAC’s reverse change in course. Its denial of my membership aids in hiding the town’s lack of progress in remediating the PFAS contamination at East Hampton Airport and supports landing more high-voltage transmission cables at Beach Lane for offshore wind farms, which are ten times larger than South Fork Wind.

Finally, the WCAC risks establishing a troubling new standard. Anyone who stands up for Wainscott and dares to question the Town Board can expect the WCAC to turn its back on them (and Wainscott) in favor of the Town Board. Thus, the Wainscott Citizens’ Advisory Committee has demonstrated it no longer represents Wainscott citizens and has no purpose.

Therefore, I respectfully request that the Wainscott Citizens’ Advisory Committee publicly state why it voted *against* a Wainscott citizen for the first time in its forty-year history.

Please respond within the next five days (by Tuesday, December 17). In the meantime, if you have any questions, please do not hesitate to contact me.

Sincerely yours,


Simon V. Kinsella



OVERVIEW OF PERFLUOROPROPANOIC ACID (PFPrA)

Description

Perfluoropropanoic acid (PFPrA) is an ultra-short-chain PFAS, which is defined as having three or fewer carbon atoms.

Per- and polyfluoroalkyl substances (PFAS) are a class of several thousand synthetic chemicals used widely in consumer and industrial products because of their stainproof, greaseproof, waterproof, non-stick and other properties.¹ A member of the perfluoroalkyl carboxylic acid subclass of PFAS², the molecular formula for PFPrA is C_2F_5COOH or $C_3HF_5O_2$, as shown in *Figure 1*. PFPrA is referenced under multiple names and identifiers, including pentafluoropropionic acid, perfluoropropionic acid, PPF Acid, and CAS registry number 422-64-0.³ The safety data sheet for PFPrA indicates that in sufficient quantities it is corrosive, an irritant, and its label is to include the signal word "danger."⁴

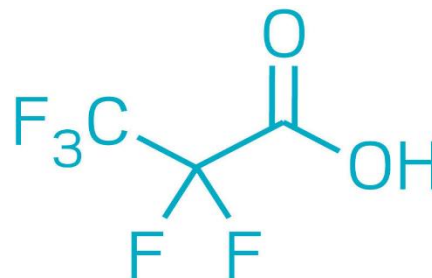


Figure 1 The chemical structure of one PFPrA.

Sources

PFPrA is manufactured for use in various products. It is also a product of longer-chain PFAS decomposition and a byproduct of manufacturing.

Chemical manufacturers such as Fisher Scientific define PFPrA as "an efficient catalyst for the preparation of dibenzo[a,j] xanthenes by a condensation reaction of beta-naphthol with aryl aldehydes."⁵ Xanthenes have a wide range of biological and pharmaceutical uses, including agricultural disinfectant, anti-inflammatory, antiviral, photodynamic therapy, dyes, laser technology, and fluorescent to view biomolecules.⁶ In the research literature, the various sources of PFPrA in the environment are still debated. It is widely agreed that PFPrA is a "breakdown product", i.e., a result of chemical and physical processes that can degrade longer chain PFAS into PFPrA.^{1 7 8} Studies have detected PFPrA in rainwater, drinking water, source water, and even in ice cores⁹. This has been linked by researchers to the switch from ozone-depleting CFCs to replacement refrigerants such as hydrofluorocarbons (HFCs), hydrochlorofluorocarbons (HCFCs) and hydrofluoroolefins (HFOs) which break down to PFPrA and other ultra-short-chain PFAS⁹.

It is a known byproduct of the PFAS manufacturing process in the Cape Fear River. It is referenced in compliance reports issued by Chemours under the Consent Order signed on February 26, 2019.¹⁰ PFPrA (PPF Acid) was also included in a table labeled as "Classification of Table 3+ PFAS" in an appendix to a Corrective Action Plan submitted by Chemours on December 31, 2019.¹¹ This plan states: "The PFAS that originate from the Site are referred to as Table 3+ PFAS." Because of the well documented contamination at the Fayetteville Works site, it is clearly evident the PFPrA contamination in the lower Cape Fear is sourced from Chemours/DuPont manufacturing activities of the last 40 years.

Prevalence in Drinking Water

Research conducted in the United States and in other countries has detected PFPrA in drinking water and other media.

Laboratory testing methods cannot identify, isolate, and measure all of the thousands of known PFAS compounds in various media, including water. Work is ongoing to expand this field of knowledge.

PFPrA is not among the 29 PFAS compounds captured by the U.S. Environmental Protection Agency's (EPA) approved PFAS testing procedures (Methods 533 and 537.1).

The National Resource Defense Council (NRDC) conducted a pilot study across 16 states. This study used advanced PFAS testing or "modified methods" (MM 533 & 537.1) from contract laboratory Eurofins that can detect 70 different types of PFAS compounds.⁷

This study found that PFPrA was the most frequently occurring compound in drinking water systems, detected in 24 of 30 samples.⁷ It was also the PFAS compound reported at the highest concentrations in 15 of 30 samples.

If the NRDC study proves to be an accurate representation of the extent of PFPrA contamination nationwide, it suggests that ongoing monitoring at drinking water utilities under the fifth unregulated contaminant monitoring rule (UCMR 5) will likely underreport the prevalence of PFAS in drinking water due to the absence of such a prevalent PFAS.

Testing

While tests are available to detect PFPrA, no approved methodology exists, and challenges have been observed with testing accuracy and repeatability.

To reiterate, PFPrA is currently not measured under EPA-approved methods 533 or 537.1 and is not included on the UCMR 5 list of contaminants for nationwide monitoring. All other analytical methods, including the one used by CFPUA's contract laboratory, are considered experimental or unvalidated, with various levels of confidence among members of the scientific community. There seems to be, however, general agreement that the modified methods (MM 533 & 537.1) used by certain contract laboratories are valid and adequate for Chemours Consent Order compliance monitoring.

As early as 2019, Chemours had included PFPrA (PPF Acid) in monitoring results, but later correspondence with State officials led to the removal of PFPrA from Table 3+PFAS monitoring. On May 18, 2022, correspondence from Chemours to NCDEQ indicated the development of new analytical methods that could be used for PFPrA.¹² It is unclear at this time whether Chemours has resumed monitoring for PFPrA as part of its Consent Order compliance.

GEL laboratories performs PFAS analysis for both CFPUA and NCDEQ. GEL has undergone extensive laboratory verification and onsite audits by NCDEQ and the U.S. Department of Defense (DOD). GEL uses an internally developed modification of EPA Method 537.1 that incorporates isotope dilution. Methods incorporating isotope dilution are generally considered the most accurate at lower detection levels for all PFAS, including short- and ultra-short-chain compounds. Nevertheless, as this method is not certified and its development is still evolving, there are periodic issues with quality assurance and quality control (QA/QC), as well as potential variations in results between laboratories.

Toxicity

More studies are needed to assess the spectrum of potential health risks. There is low confidence in recently published findings, which have been modified at least once.

On July 7, the EPA Office of Research and Development (ORD) published a human health toxicity value for PFPrA with a calculated non-cancer chronic reference dose (RfD) of 0.0001 mg/kg per day.¹³ This value was revised as of August 1, 2023, to a calculated non-cancer chronic reference dose (RfD) of 0.0005 mg/kg per day. A chronic RfD is defined as “an estimate (with uncertainty spanning perhaps an order of magnitude) of a daily oral exposure of the human population to a substance that is likely to be without an appreciable risk of deleterious effects during a lifetime,” according to EPA.¹⁴ An RfD is one input often used to establish non-regulatory advisories (HALs or PHGs) and regulatory limits (MCLs) for contaminants.

Limited available health hazard and dose-response relevant evidence prompted EPA to have “low confidence” in its RfD for PFPrA. As a result, there is a “high level of uncertainty in the derived RfD” according to the study.⁹ In animal studies, the compound was associated with altered liver function. No clear associations were established with health conditions such as thyroid, hormone, and fertility conditions. PFPrA was not tested for carcinogenicity.

There is not enough information at this time to confidently project a future PFPrA Health Advisory Level (HAL), Preliminary Health Goal (PHG) or Maximum Contaminant Limit (MCL).

We do know that the final chronic RfD for GenX of 0.000003 milligrams per kilogram body weight per day (mg/kg bw-day)¹⁵ is two orders of magnitude lower than that of PFPrA, suggesting a much higher potential threshold for future HALs or PHGs for PFPrA. The HAL and proposed MCL for GenX is 10 ppt, and two orders of magnitude would suggest a PRPrA HAL or MCL of more than 1,000 ppt. These assumptions are only speculation at this time.

On July 31, 2023, CFPUA staff spoke with NCDEQ environmental toxicology staff familiar with PFAS and the evolving issue of PFPrA. NCDEQ staff are still evaluating the new EPA publication. As of July 31, 2023, PFPrA was not identified as a compound of concern on either EPA’s PFAS Strategic Roadmap or NCDEQ’s Action Strategy for PFAS, indicating the evolving understanding of the regulatory community regarding this contaminant.

Environmental Impact

Research shows that, like other per- and polyfluoroalkyl substances, PFPrA can travel from water to plants, leading to bioaccumulation in animals.

As mentioned previously, PFPrA is an asserted product of the degradation of other chemicals. Experiments with a substitution for PFOS in wheat plants have been shown to break down into PFPrA and other PFAS compounds. The existence of these compounds in the wheat plant also seemed to have had an adverse effect on the plant’s health.¹⁶ Additionally, experiments on the interaction of gaseous PFPrA resulted in the creation of new particles when exposed to other common atmospheric molecules.¹⁷

Relevance to CFPUA

PFPrA has been detected in the Monterey Heights, Sweeney, and Richardson water systems, in both raw water sources and in finished water samples, in varying low concentrations.

Cape Fear Public Utility Authority's (CFPUA) practice has been to add new PFAS compounds to its regular testing framework as academic and commercial laboratories develop analytical methods to test and provide repeatable results for new compounds. As noted previously, these methods are experimental and not certified.

In January 2022, CFPUA gained access to testing capabilities for several newly isolated compounds (including PFPrA) from its contract laboratory (Enthalpy). Because of several ongoing laboratory issues including questionable accuracy of the results for PFPrA, CFPUA switched to Gel laboratories in June 2022. Accuracy for PFPrA analysis was an issue within a few months of making this change and was not resolved until April 2023. Accuracy of data for PFPrA from samples prior to this date is questionable.

PFPrA has been detected in the Sweeney and Richardson water systems, in both raw water sources and in finished water samples, in varying concentrations. PFPrA has also been detected in water produced by the Monterey Heights groundwater system.

The Richardson Water Treatment Plant (WTP) is a reverse osmosis (RO) facility, and the Sweeney WTP is a conventional sedimentation-flocculation design with ozonation, biological filters, new deep bed granular activated carbon (GAC) filters and ultraviolet (UV) disinfection.

Interestingly, testing at both facilities also indicated a disparity in paired raw water and finished water samples, with finished water samples frequently having higher PFPrA results than raw water samples taken at the same time.

PFPrA data from both Enthalpy and GEL labs are displayed below in Figures 2 and 3. It should be noted that between January 2022 and March 2023, some samples were flagged by the contract labs for quality assurance and quality control (QA/QC) errors. The method blanks used in the testing procedure were contaminated with and/or had an interference with PFPrA.

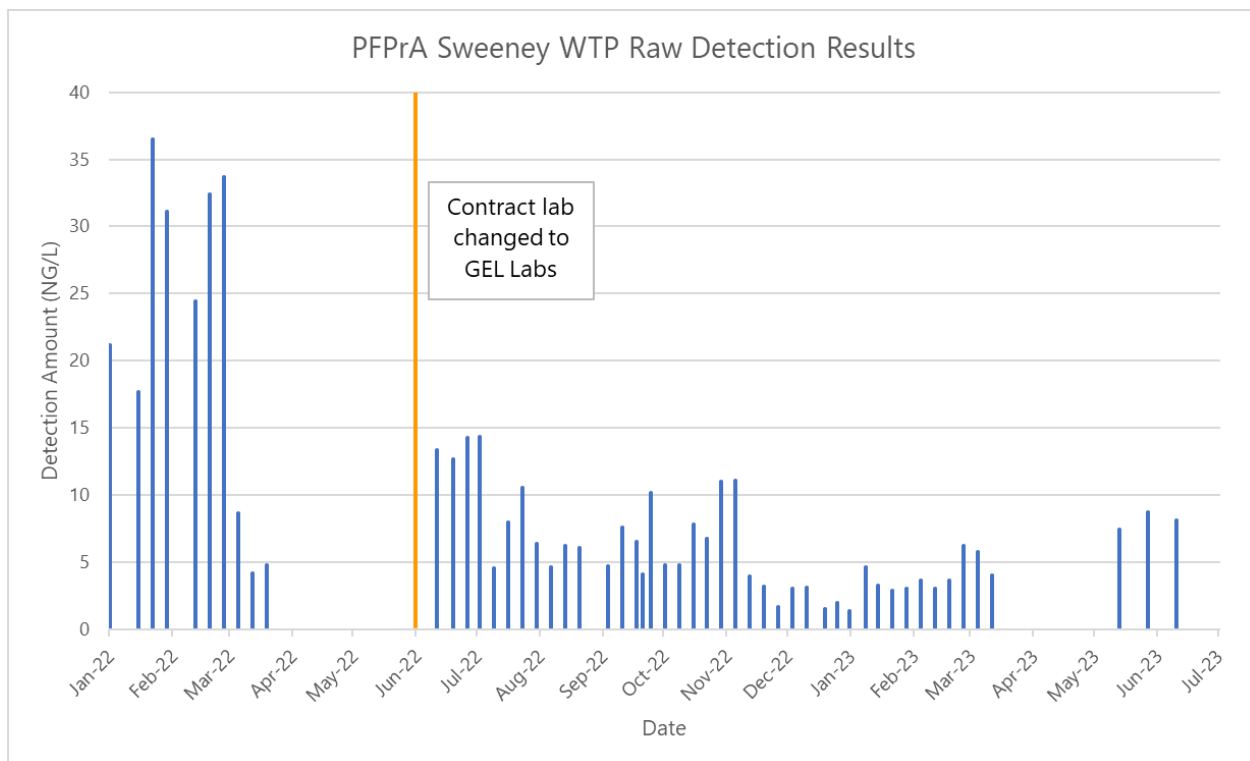


Figure 2. Detected levels of PFPrA in Sweeney raw water samples collected from January 2022 to present

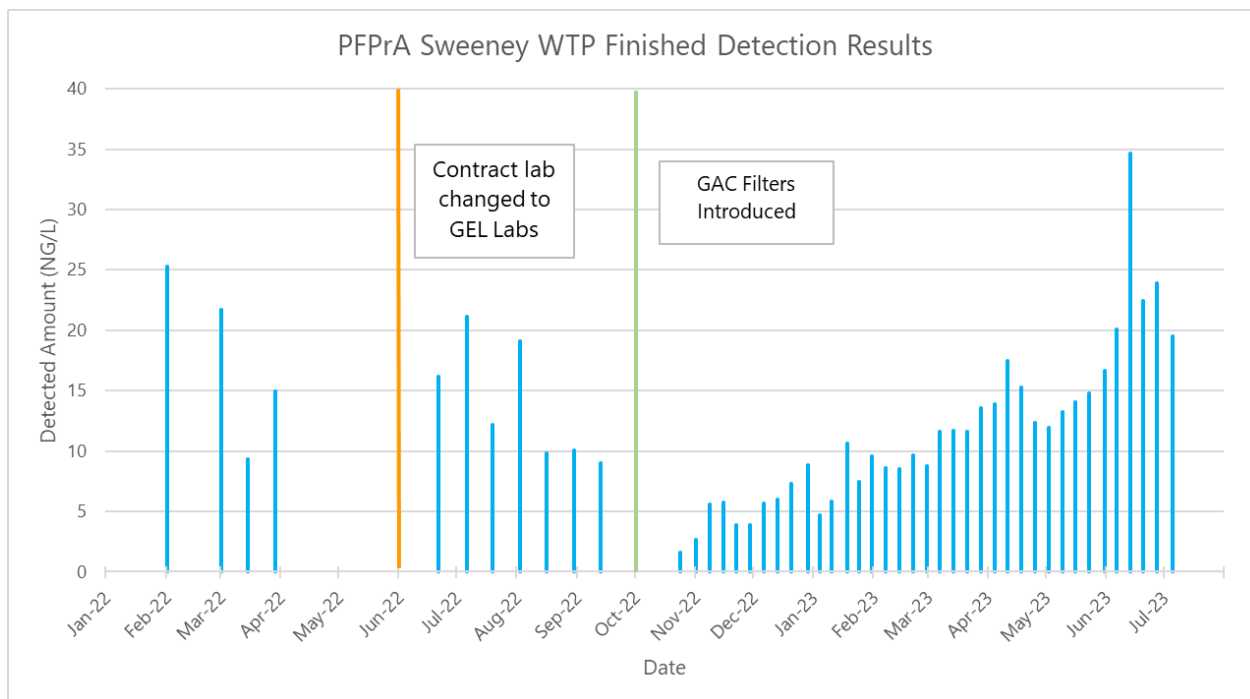


Figure 3. Detected levels of PFPrA in Sweeney Finished samples collected from January 2022 to present. The green line indicates when the GAC filters were introduced in October 2022.

OVERVIEW OF PERFLUOROPROPANOIC ACID (PFPrA)

CFPUA continues to monitor for PFPrA and to publish all results on our website. New deep bed GAC filters began operating at Sweeney on October 10, 2022. Following this, there was only one testing period of no detection (ND) for all tested compounds. Thereafter PFPrA was the only compound detected in finished water until December 29, 2022. As noted earlier, CFPUA staff have low confidence in PFPrA results prior to April 2023.

Testing at both treatment facilities also continues to display a disparity in raw water and finished water samples, with finished water samples often having higher PFPrA results than paired raw water samples.

At Sweeney, the disparity may be caused by desorption of PFPrA from the biologically active GAC filters and/or from the deep bed GAC filters themselves. For the Richardson facility, the disparity may be tied to the specific well or section of well fields used as source water to stabilize the permeate through post-membrane blending. More research at each facility is required.

Conclusions and Next Steps

- Available information is insufficient to draw conclusions regarding the impact of PFPrA on drinking water at a national, state, or local level.
- The best estimates by CFPUA staff suggest current finish water concentrations of PFPrA would be well below any future health advisory levels or maximum contamination limits, but this is only speculation.
- CFPUA staff will continue to monitor raw and finished water from Sweeney, Richardson, and Monterey Heights for PFPrA and will publish results on the CFPUA website following review by contract laboratories and CFPUA staff for laboratory QA/QC.
- CFPUA staff will engage NCDEQ to undertake an evaluation of PFPrA and seek its addition to the State's NCDEQ Action Strategy for PFAS, if necessary.
- CFPUA's Sweeney deep bed filter facility was designed with flexibility regarding treatment techniques and sorbents. This flexibility will be useful if different sorbents are required to treat PFPrA or other ultra-short chain PFAS in the future.
- CFPUA will work with academic partners such as the North Carolina Collaboratory, as well as with consultants and vendors, to evaluate treatment techniques for ultra-short-chain PFAS such as PFPrA.

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