

**NEW YORK**  
*state department of*  
**HEALTH**

Howard A. Zucker, M.D., J.D.  
Acting Commissioner of Health

Sue Kelly  
Executive Deputy Commissioner

June 23, 2014

David S. Warne  
Assistant Commissioner  
NYC Department of Environmental Protection  
Bureau of Water Supply  
465 Columbus Avenue  
Valhalla, NY 10595

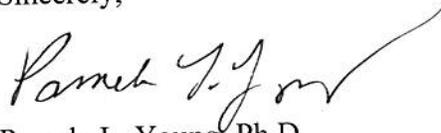
Dear Mr. Warne:

NYSDOH/USEPA and NYSDEC have reviewed NYCDEP's response to our comments on NYCDEP's proposal for a study to evaluate the need for a community wastewater management system for the Hamlet of Shokan. As the cover letter to NYCDEP's responses (dated May 23, 2014) states, NYSDOH/USEPA and NYSDEC are not requiring that NYCDEP collect water quality data from the SHOKAN sampling site in order to make a determination regarding the potential need for a wastewater management system. While monitoring at this site may detect an impact on water quality that can be traced to failing septic systems, such signals may be temporally and spatially intermittent, making potential impacts difficult to detect. So while water quality monitoring may detect pathogens and their indicators, the absence of such detection does not necessarily negate the need for a community wastewater management system.

For this reason, NYSDOH/USEPA and NYSDEC do not believe water quality monitoring results should be the sole or primary basis for making a decision. We will rely primarily on the information listed in Comment 6 and the first bullet of Comment 7 in our December 24, 2013 comment letter to evaluate the potential need for a community wastewater system. Evaluation of the information requested in Comments 6 and 7 (i.e., population of Shokan, number and ages of septic systems, lot sizes, distance of septic systems from waterways/drainageways, topography, soil types, history of septic system failures/issues, information on frequency of septic tank pump-out, and assessment of whether or not lots can support a system that meets current standards) will enable us to determine whether the community's wastewater is being adequately managed or whether septic system failures may be likely to occur and impact water quality in the future. This evaluation may indicate that a community collection and treatment system or a septic management district is needed, or that the current septic repair and replacement program is adequate to protect the quality of NYC's Ashokan Reservoir water supply.

Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Pamela L. Young". The signature is fluid and cursive, with a long, sweeping tail that extends to the right.

Pamela L. Young, Ph.D.  
Acting Chief, NYC Watershed Section  
Bureau of Water Supply Protection

Cc: R. Sokol  
T. Boepple  
J. Hyde  
P. Palmer  
A. Thompkins – USEPA  
P. Sweeney – USEPA  
T. Snow – NYSDEC  
K. Kosinski – NYSDEC