



Skaneateles Lake Association, Inc.
P. O. Box 862 • Skaneateles, NY 13152

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February 27, 2022

Karyn Hanson
NYS DEC – Division of Environmental Permits
625 Broadway, 4th Floor
Albany, NY 12233-1750

Re: SLA Updated Comment Re: Public Hearing on Draft Permit Application for EarthTec (Active ingredient: Copper Sulfate 19.8%)

Skaneateles Lake Association Public Comment on City of Syracuse SPDES Algicide Permit Application #7-3150-00112/00004

Dear Ms. Hanson:

Please consider this letter as an update to and reaffirmation of the public comment letters submitted to the NYSDEC by the Skaneateles Lake Association (SLA) on September 30, and August 5, 2021 (Appendix A).

Opposition to use of EarthTec still remains due to uncertainties and lack of reassurances

The **SLA still remains in opposition** at this time re: EarthTec being permitted by the NYSDEC as a Harmful Algal Bloom (HAB) treatment option on Skaneateles Lake by the City of Syracuse or any affiliates.

For varying reasons outlined below and in more detail in previous written comments submitted to the NYSDEC, SLA considers the **permit application insufficient in detail leading to too many uncertainties along with a lack of reassurances to the community** regarding the proposed use of the algicide EarthTec.

Beyond the insufficiencies relevant to the permit application additional concerns related to the use of EarthTec include:

- Possible **ineffectiveness of proposed EarthTec application** to the lake surface only on the north end region of the lake during a lake wide algal bloom event with some sets of intake pipes being deeper in the water column.
- **Absence of an operations, maintenance, and monitoring plan** associated with the proposed treatment system. City of Syracuse noted in the application that a pesticide management plan would be provided AFTER permit approval.

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- **No example provided showing use of product on reservoirs similar to Skaneateles Lake with a filtration avoidance waiver** has resulted in interpreting use of EarthTec as "experimental".
- **Evidence of copper levels in lake sediment already at unacceptable levels** requiring further evaluation from NYSDEC re: **possible negative impacts on aquatic life**. Assessment should be conducted prior to any consideration of the use of EarthTec that could potentially add more copper into Skaneateles Lake.

The comments provided in the September 30, 2021 letter and the “statements, requests, and recommendations” summarized at the end of the enclosed SLA’s August 5th letter still remain of significant importance regarding the assessment of EarthTec environmental impacts and the effectiveness in the abatement of HABs.

Acknowledgement of NYS DEC response to require a Public Hearing

As was requested in the September 30, 2021 letter, SLA appreciates the decision being made to conduct a Public Hearing, but also considers that the **additional time allotted to further assess** the uncertainties and lack of reassurances as highlighted in previous comment letters has been **insufficient in addressing SLA’s concerns**.

Continued and increased concerns relevant to past comment letters

Efficacy of EarthTec treatment - Upon further review of the draft application to use EarthTec, SLA **questions the effectiveness of treatment of Harmful Algal Blooms with EarthTec** during a lake-wide event when treatment would only be applied to the northern end of the lake. Additionally, it is **questionable as to whether the surface application of the EarthTec product would effectively treat harmful cyanobacteria that is deeper in the water column** near some of the City of Syracuse intake pipes.

Request for adequate evaluation – SLA continues to request that:

- Potential **long-term impacts** on aquatic and human life from existing levels of copper **be considered and evaluated** by scientists not affiliated with the EarthTec parent company.
- **NYSDEC bases decision** to allow adding more Copper via the active ingredient in EarthTec **on existing copper levels in sediment.**
- **Require a comprehensive plan** for monitoring potential impacts from proposed treatment solution to be provided **in advance of permit authorization.**

In the September 30, 2021 comment letter, SLA requested that a baseline be established for Copper levels prior to considering additional copper. Associated with that request was the inquiry as to whether the NYS DEC would adhere to its 1999 publication titled “Technical Guidance for Screening Contaminated Sediments”.

Since the requests were made, SLA was able to review the June 24, 2014 NYS DEC document titled "Screening and Assessment of Contaminated Sediment" and learned more from a past DEC commissioned 2001 study re: Copper levels as well as reviewed additional sediment data provided by Syracuse University. In the screening and assessment document, it indicates that **sediments containing Copper at levels between 32 and 150 mg/kg initiate guidance where "additional testing is required to evaluate the potential risks to aquatic life."**

Data from the NYS DEC's July 2001 "Water Quality Study of the Finger Lakes", authored by Clifford W. Callinan, P.E., noted a **peak level of copper at 78 ppm or mg/kg on Skaneateles Lake.**

Preliminary Syracuse University core sediment data results indicate:

Sediments (124 samples analyzed)

- 94 of the 124 samples analyzed had greater than 32 mg/kg of copper (suggesting Class B levels)
- Min – 6.6 mg/kg
- Max – 105.4 mg/kg
- Avg 47.1 mg/kg
- Stdev – 21.61 mg/kg

Has the NYS DEC conducted additional testing to evaluate potential risks to the aquatic life based on Skaneateles Lake already having unacceptable levels of copper in its sediment? This would be extremely important prior to potentially permitting the addition of more copper-based products.

There is also **additional concern** based on the review of a study titled "Side Effects of 58 Years of Copper Sulfate Treatment of the Fairmont Lakes, Minnesota" by Mark J. Hanson and Heinz G. Stefan **noting long term impacts of Copper Sulfate** "including: **a) copper accumulation in the sediments, b) tolerance adjustments of certain species of algae to higher copper sulfate dosages, c) shift of species from green to blue-algae and from game fish to rough fish, d) disappearance of macrophytes and e) reductions in benthic Macroinvertebrates.**

These concerns combined with the lack of information as to whether the EarthTec product has been applied to other surface waters of drinking water reservoirs having a filtration avoidance waiver **still calls for SLA's opposition to its use in Skaneateles Lake.**

Conclusion

Thank you again for providing more opportunities for SLA and the community to voice concerns. In addition to the comments above, please review our previous written comments from September 30 and August 5, 2021 (enclosed below) that still represent our main concerns. Please find below a summary of those concerns:

Summary of Statements, Requests, and Recommendations

The Skaneateles Lake Association:

- **strongly opposes at this time the NYSDEC permitting the City of Syracuse the ability to introduce the algicide EarthTec into Skaneateles Lake.**
- **requests that the NYSDEC postpones determination on the permit request until significant concerns outlined in this comment can be adequately addressed by the City of Syracuse, NYSDEC, EarthTec, and the appropriate scientific community.**
- **requests that more information be provided regarding the selection of EarthTec and assessment of other alternatives if any.**
- **has concerns about the risks associated with treating Microcystis cyanobacteria with a product such as EarthTec that could remain in the lake's ecosystem over time.**

- requests more information from an entity such as the Environmental Protection Agency on the potential impacts on a water body from EarthTec
- recommends that there is further investigation regarding what the impacts are to other similar bodies of water with similar application.
- requests information on the long-term risks and threats not only to humans, but also to how the application of EarthTec could impact the lake's ecosystem.
- recommends that there be more time for scientists familiar with Skaneateles Lake and Microcystis to confer with scientists at EarthTec to better understand potential impacts together before a determination is made to allow for the use of EarthTec.
- recommends that the City of Syracuse provides more details regarding the treatment protocol of applications and monitoring operations.
- requests that information is provided on how the treatment application is incorporated into a well-established and vetted emergency action plan.
- recommends a continued assessment of the strategy of applying technologies like ultrasound and products such as EarthTec into the Woodland Reservoir as opposed to the open waters of Skaneateles Lake.
- recommends that a baseline of copper in the existing sediment be established and be evaluated for negative short and long term impacts on aquatic life prior to any potential further introduction into Skaneateles Lake.
- recommends that the NYSDEC adhere to its own established guidance when making a decision to allow for the use of EarthTec on Skaneateles Lake in regards to existing levels of copper in sediment.
- recommends that the NYSDEC provides other specific visual biological impact examples to look for beyond fish kills to trigger the cessation of the application of EarthTec.
- recommends that there be a sufficient operations, maintenance, and monitoring plan associated with the proposed treatment system.
- recommends a stronger response of enforcement from the NYSDEC, NYSDOH, and City of Syracuse regarding the greater need for more stringent protections in our watershed.
- requests that the NYSDEC and City of Syracuse continue to invest in and expedite the development of more benign treatment technologies, products, and strategies in the management, mitigation, and prevention of Harmful Algal Blooms.

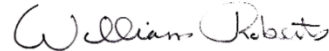
Sincerely on behalf of the Skaneateles Lake Association,



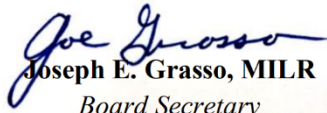
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Executive Director



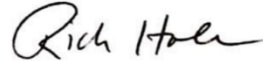
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Board President



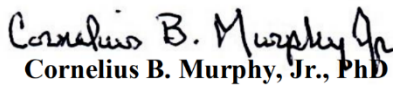
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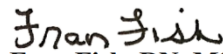
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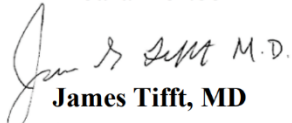
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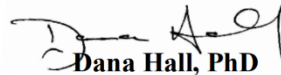
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William Dean, PhD
Board Member
Lake Ecology Team Co-Chair



APPENDIX A

Skaneateles Lake Association, Inc.

P. O. Box 862 • Skaneateles, NY 13152

September 30, 2021

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Karyn Hanson
NYSDEC Headquarters
625 Broadway
Albany, NY 12233

Re: SLA Updated Comment on Use of EarthTec (Active ingredient: Copper Sulfate 20%)

Skaneateles Lake Association Public Comment on City of Syracuse
SPDES Algicide Permit Application #7-3150-00112/00004

Dear Ms. Hanson:

Please consider this letter as an update to and reaffirmation of the public comment letter submitted to the NYSDEC by the Skaneateles Lake Association (SLA) on August 5, 2021.

Restatement of Opposition

The SLA still remains in opposition at this time re: EarthTec being permitted by the NYSDEC as a Harmful Algal Bloom (HAB) treatment option on Skaneateles Lake by the City of Syracuse or any affiliates due to a continuation of too many uncertainties and not enough reassurances regarding EarthTec and its potential use.

The "statements, requests, and recommendations" summarized at the end of the enclosed SLA's August 5th letter still remain of significant importance regarding the assessment of EarthTec and the abatement of HABs.

SLA does appreciate and acknowledges that a few of the requests have partly been addressed in regards to 1) holding a public information meeting; 2) postponing determination to allow for further exploration; and 3) the City of Syracuse providing some historical copper data to local experts.

Response Re: Public Information Meeting

The SLA values that the request to hold a public information meeting hosted by the City of Syracuse with participation from the NYSDEC and EarthTec representatives was responded to. While it is understood that scheduling of the meeting hosts and presenters was a factor, having one meeting session at noon during the work week may have not been the most ideal time to engage the community. The opportunity to further engage and inform the community by providing a recording of the meeting prior to the end of the public comment period on October 1, 2021 was expected and did not occur.

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Additionally, some of the information provided by representatives of EarthTec during the meeting created some confusion in regards to the safety of the product when applied. The SPDES Permit Fact Sheet NY 0300004 notes microcystin as a by-product to the application of EarthTec and mentions “additional oversight and monitoring to ensure the safety of the public who recreate in the lake.” The fact sheet also notes monitoring at public bathing areas, but does not call for a provision to monitor additional areas where private homeowners recreate as well. Lastly, a representative from EarthTec noted at the public information meeting that it would be safe to swim and drink water immediately after EarthTec was applied to the water. The aforementioned observations in addition to the EPA’s Master Label warnings stating to avoid contact and ingestion and to use personal protective equipment when using causes even more uncertainty regarding the use of EarthTec.

The public information meeting was helpful in regards to the overview of timeline and information provided by the NYSDEC and with the City of Syracuse’s pledge that the use of the product is viewed similarly to a life insurance policy and that it is for emergency last resort use. Beyond that, the meeting did not seem to address many concerns outlined in SLA’s August 5th letter and did not engage other scientific experts that are not affiliated so closely with the EarthTec chemical company.

Response Re: Permit Determination Timeline and Request for a specific SPEDES Permit and Public Hearing

SLA recommends that the NYSDEC requires a public hearing regarding the use of EarthTec. Additionally, SLA requests that the determination timeline be extended beyond February 2022 to allow for further assessment.

Establishing a Baseline for Copper Data in Skaneateles Lake Sediment and Adherence to NYSDEC’s 1999 “Technical Guidance for Screening Contaminated Sediments”

The sediment quality of Skaneateles Lake is very important in establishing the health of the Lake ecosystem. Has NYSDEC reviewed the following NYSDEC technical guidance document and sediment quality information in the process of evaluating the EarthTec product proposed to be applied to Skaneateles Lake?

“ Technical Guidance for Screening Contaminated Sediments “ NYSDEC 1999

This document defines the maximum contaminant content of sediments that is protective of human health and the protection of aquatic and benthic organisms and wildlife.

In this context was historical sediment data reviewed relative to copper concentrations and potential need to acquire sediment sample and determine the current baseline for the concentration of copper in the sediments?

The NYSDEC 1999 document is very clear in recommending a LEL (Lowest effects level) of 16 mg/Kg dry weight and a SEL (Severe effects level) of 110 mg/Kg dry weight level.

It is expected that a large portion of the copper sulfate applied to the northern part of the lake would wind up in the sediments. It is very important to understand what the current copper sediment concentrations

are and to what degree the introduction of the Earth Tech product will increase their concentration in the sediment.

It is our opinion that the regulatory agency (NYSDEC) has a responsibility to conduct this evaluation using its own guidance prior to approving the use of this EarthTec product in the direct treatment of the lake water. Skaneateles Lake is an Extraordinary natural resource and deserves this standard of care.

Conclusion

SLA truly values the City of Syracuse and NYSDEC's willingness to further explore and assess viable and sensible solutions toward treating HABs and expects great care in future decision making as it impacts the quality of drinking water and quality of life that Skaneateles Lake continues to provide the local and regional communities. Thank you for considering the aforementioned and the previous August 5th public comment letter below.


Sincerely on behalf of the Board of Directors, Skaneateles Lake Association Inc.,



Frank H. Moses
Executive Director



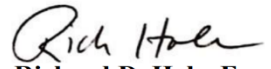
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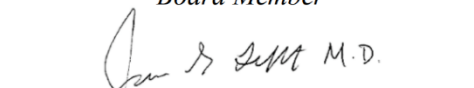
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Skaneateles Lake Association, Inc.
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August 5, 2021

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Re: Use of EarthTec (Active ingredient: Copper Sulfate 20%)

Skaneateles Lake Association Public Comment on City of Syracuse
SPDES Algicide Permit Application #7-3150-00112/00004

Dear Ms. Hanson:

Position of opposition

The Skaneateles Lake Association (SLA), a not for profit established in 1969 to ensure the protection of Skaneateles Lake and its watershed, *strongly opposes at this time the New York State Department of Environmental Conservation (NYSDEC) permitting the City of Syracuse the ability to introduce the algicide EarthTec into Skaneateles Lake.*

Recommendation to postpone determination due to uncertainties and lack of reassurances

While SLA shares and respects the concern and responsibility to maintain public safety through the protection of drinking water, **there are currently too many uncertainties** regarding the treatment product and application protocols and **not enough well established reassurances** that are associated with the potential impact and use of the algicide. It is because of the uncertainties and lack of reassurances, **SLA requests that the NYSDEC postpones determination on the permit request until significant concerns outlined in this comment can be adequately addressed by the City of Syracuse, NYSDEC, EarthTec, and the appropriate scientific community.**

Selection of EarthTec and associated uncertainties

On behalf of the concerned community, **SLA would request that more information be provided in regards to how EarthTec was selected as a suitable and effective product juxtaposed against other alternatives and inquire whether other treatment options, that are currently available and potentially permissible, were assessed.** There are concerns about the risks

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associated with treating Microcystis cyanobacteria with a product such as EarthTec that could remain in the lake's ecosystem over time. There is also interest as to whether peroxide based treatments were assessed as well as other chelated copper sulfate algicides and whether EarthTec was determined to be most appropriate or was it just one of the only products looked into prior to submitting the permit application? Better understanding the parameters that aided in selection and assessment of EarthTec as a product may be beneficial in knowing what other alternatives have been possibly overlooked.

Also, at this time, there has been no success in procuring 3rd party or government based assessment of EarthTec as a product. **Having more information from an entity such as the Environmental Protection Agency on the potential impacts on a water body from EarthTec** and not just literature provided by the company itself is a reasonable expectation in the assessment process. Earth Science Laboratories, Inc. reports that their product EarthTec “kills cyanobacteria without causing cell lysis”, which is important due to the risk of additional microcystins being released from cell wall disruption. The SLA recommends that there be time for more government and 3rd party assessment of this report that is not based on the company claims or studies paid for by the company. This is an extremely important factor that would require more reassurance in a laboratory and mesocosm field tests with conditions similar to Skaneateles Lake.

There has been information provided showing that other municipalities use EarthTec at drinking water treatment plants, but none procured yet that depicts application into surface waters on a body of water with shoreline residents and recreational swimming. It also unclear as to whether the application of EarthTec on Skaneateles Lake is unprecedented in terms of surface water application on a body of water that is reservoir with a filtration avoidance waiver. **SLA recommends that there is further investigation regarding what the impacts are to other similar bodies of water with similar application.**

While EarthTec is noted to meet NSF American National Standard 60 for Drinking Water Treatment Chemicals when applied beneath guidance thresholds, **what is unclear or unprovided at this point are the long term risks and threats not only to humans, but also to how the application of the product could impact the lake's ecosystem.**

SLA recommends that there be more time for scientists familiar with Skaneateles Lake and Microcystis to confer with scientists at EarthTec to better understand potential impacts together before a determination is made to allow for the use of EarthTec.

Lack of Reassurances regarding Proposed Treatment Application and Protocols

With sufficient time allowed to more adequately determine whether or not EarthTec is properly assessed as being a suitable choice as a product to treat Microcystis cyanobacteria, what is equally important in tandem, is to **provide more details regarding the treatment protocol of applications and monitoring operations** so that the community confidence exists regarding necessary safeguards.

While the permit application provides information on thresholds, triggers, and cessation guidance, **it is not clear on how the treatment application is incorporated into a well-established and vetted emergency action plan.** The City of Syracuse Water Department has verbalized intentions related to the application of EarthTec as a last resort, emergency use insurance policy that provides additional barriers in an overall plan, but there has not been provision of an implementation plan that includes a definition of the parameters of emergency use with various scenarios addressed. The development of this plan would be recommended before determination of use of EarthTec or other treatment systems would be recommended. The plan should include who makes what decision at which time based on what information, who the applicators are and what their safeguards are and what quality assurances exist to ensure proper application, what the plan is if for some reason the product is not applied correctly or in

event of a product spill, ascertaining the efficacy of the treatment proposal all together if a lake wide bloom continues to populate the north end with a migrating south end source or in the event that microcystin toxins at dangerous levels are sustained beyond the permitted application allowance period and would require additional application, and what the responsibility is of the City of Syracuse, the impacted municipalities, and the greater community to ensure effective communications to eliminate any exposure to the product after its potential use.

Additionally, regarding the application of the proposed treatment system, **SLA recommends a continued assessment of the strategy of applying technologies like ultrasound and products such as EarthTec into the Woodland Reservoir as opposed to the open waters of Skaneateles Lake.**

It is a more than reasonable expectation to see that the aforementioned is sufficiently addressed prior to determination of the use of EarthTec and/or other treatment systems.

Insufficient impact evaluation process

Due to the history of introduction of copper sulfate and its existence in geology, **it is recommended that a baseline of copper in the existing sediment be established prior to any potential further introduction into Skaneateles Lake.**

In regards to monitoring impacts of EarthTec, it would be **recommended that the NYSDEC provides other specific visual biological impact examples to look for beyond fish kills to trigger the cessation of the application of EarthTec.** Additionally, who's responsibility will it be to monitor the potential impacts?

SLA recommends that there be a sufficient operations, maintenance, and monitoring plan associated with the proposed treatment system.

Summary of Statements, Requests, and Recommendations

The Skaneateles Lake Association:

- **strongly opposes at this time the NYSDEC permitting the City of Syracuse the ability to introduce the algicide EarthTec into Skaneateles Lake.**
- **requests that the NYSDEC postpones determination on the permit request until significant concerns outlined in this comment can be adequately addressed by the City of Syracuse, NYSDEC, EarthTec, and the appropriate scientific community.**
- **requests that more information be provided regarding the selection of EarthTec and assessment of other alternatives if any.**
- **has concerns about the risks associated with treating Microcystis cyanobacteria with a product such as EarthTec that could remain in the lake's ecosystem over time.**
- **requests more information from an entity such as the Environmental Protection Agency on the potential impacts on a water body from EarthTec**
- **recommends that there is further investigation regarding what the impacts are to other similar bodies of water with similar application.**

- requests information on the long term risks and threats not only to humans, but also to how the application of EarthTec could impact the lake's ecosystem.
- recommends that there be more time for scientists familiar with Skaneateles Lake and Microcystis to confer with scientists at EarthTec to better understand potential impacts together before a determination is made to allow for the use of EarthTec.
- recommends that the City of Syracuse provides more details regarding the treatment protocol of applications and monitoring operations.
- requests that information is provided on how the treatment application is incorporated into a well-established and vetted emergency action plan.
- recommends a continued assessment of the strategy of applying technologies like ultrasound and products such as EarthTec into the Woodland Reservoir as opposed to the open waters of Skaneateles Lake.
- recommends that a baseline of copper in the existing sediment be established prior to any potential further introduction into Skaneateles Lake.
- recommends that the NYSDEC provides other specific visual biological impact examples to look for beyond fish kills to trigger the cessation of the application of EarthTec.
- recommends that there be a sufficient operations, maintenance, and monitoring plan associated with the proposed treatment system.
- recommends a stronger response of enforcement from the NYSDEC, NYSDOH, and City of Syracuse regarding the greater need for more stringent protections in our watershed.
- requests that the NYSDEC and the City of Syracuse to co-host an informational meeting for the public to have a venue to learn more on this issue and be given the opportunity to engage in a dialogue with experts and decision makers relative to the proposed permit application.
- requests that the NYSDEC and City of Syracuse continue to invest in and expedite the development of more benign treatment technologies, products, and strategies in the management, mitigation, and prevention of Harmful Algal Blooms.

Conclusion

The SLA values the role the NYSDEC, City of Syracuse, and other governing entities provide in ensuring environmental and public safety. We are fortunate to currently have good working professionals that exude great care for our natural resources, but also realize that we may not be as fortunate in the future, thus we are **recommending more formalized assurances** to protect current and future generations and also allow enough time for the good working relationships to produce better certainty on the pathway in addressing the threat of harmful cyanobacteria. **SLA also reiterates our prior request to the NYSDEC and the City of Syracuse to co-host an informational meeting for the public to have a venue to learn more on this issue and be given the opportunity to engage in a dialogue with experts and decision makers relative to the proposed permit application.**

It is clear since the onset of the major threat of harmful cyanobacteria blooms that there is a greater need for more stringent protections in our watershed enforced by the City of Syracuse in conjunction with the NYSDEC and NYS Department of Health. We strongly advise that these protections occur in the future with better controls including, but not limited to development, adverse water-based activities, unchecked timber harvesting, and continuing to increase farming participation in best management practices. Finally, SLA requests that the NYSDEC and City of Syracuse continue to invest in and expedite the development of more benign treatment technologies, products, and strategies in the management, mitigation, and prevention of Harmful Algal Blooms.

Thank you for your strong consideration of the aforementioned.

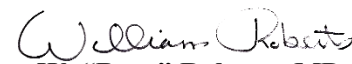
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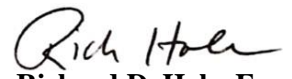
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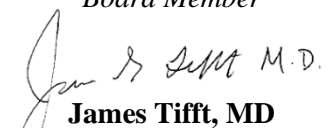
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