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To submit a comment, email RegComments@pa.gov

March 4, 2022

Independent Regulatory
Review Commission

To the PADEP,

At such a low level of any water contamination (in the part per trillions), I suggest that the EPA Method 533 (November 2019) for PFOA and PFOS Table 12 p. 46 of 52 is subject to laboratory and sampling inaccuracy that may cause undue concern and treatment costs by consumers of well water and municipal potable water suppliers.

Has the PADEP performed a Benefit/Risk/Cost analysis **"to protect the public from potential adverse developmental and immune system effects linked to exposure to PFOA and PFOS"** of the proposed lowering from the current USEPA Drinking Water Standard of 70 parts per trillion to 14 ppt PFOA and 18 parts per trillion PFOS on human health and the increased cost of potable water to consumers from Water companies throughout Pennsylvania?

Has Commissioner Ralph V. Yanora- PUC's representative on the National Association of Regulatory Utility Commissioners (NARUC) Committee on Water been advised of this proposed PADEP regulation that will result in increased treatment costs for already proposed 6% increased water bill filings to the PUC throughout SE PA by AquaPA?

14 parts per trillion equals 1.18 ounces in an Olympic size pool containing 660,430 gallons= 84,535,040 ounces (164 ft long x 82 ft wide x 6.56 ft deep)

My emailed comments from February 27 and March 3, 2022 to the President of AquaPA and others follow.

David Beck
Environmental Engineer
Melrose Park, Montgomery County, PA

-----Original Message-----

From: beckdebeck@aol.com

To: malucca@aquaamerica.com <malucca@aquaamerica.com>;
investorrelations@aquaamerica.com <investorrelations@aquaamerica.com>;
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repnelson@pahouse.net <repnelson@pahouse.net>; tmagge@pa.gov
<tmagge@pa.gov>; ra-dhpressoffice@pa.gov <ra-dhpressoffice@pa.gov>;
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Cc: kate.fishman@patch.com <kate.fishman@patch.com>; justin.heinze@patch.com

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Sent: Thu, Mar 3, 2022 12:37 pm
Subject: Bucks County Suing PFAS Manufacturers Over 'Hazardous' Chemicals

Posted Tue, Mar 1, 2022 at 3:47 pm ET|Updated Tue, Mar 1, 2022 at 3:54 pm ET



Bucks County is suing a number of PFAS manufacturers across ten counts, commissioners and the DA announced Tuesday afternoon. (Kate Fishman/Patch)

Replies (13)

Terry Bailey, Neighbor

Newtown, PA|1d

Article only provokes. There are no specifics. Lazy. Where were the chemicals found? How many PPM are safe? and not safe? What are the precautions. What are the adverse events What is the history of adverse events. Seriously, I would have to fire this writer.

Thank (6) Reply

Doug Crompton, Northampton, PA|1d Neighbor

-

(He is INTELLIGENT -unlike you DAs, Yellow journalists, and politicians like Madeleine Fuji Dean who used PFAS in 2020 to get re-elected)

This is mostly a problem for those using private wells. Public water is tested and at least in the case of several suppliers like Horsham the water is filtered for PFAS. Private wells are another story. Testing can be done but filtering is not easy to do. This is why we distill all of our drinking and cooking water, adding back in clean minerals. Distillers are available on Amazon. Another option is Reverse Osmosis or RO which also would remove all chemicals, but with a private well you need to be careful with RO as any pathogens in the water could propagate in the filter and contaminate the resulting water. Often chlorine is added prior to RO which solves this problem. The chlorine is then completely filtered by the RO. The PFAS problem has been known for years and there have been numerous articles in the local and national news about it. The Willow Grove NAS and the Naval Air development Center both used fire fighting foam containing PFAS. I can remember when NADC had public open houses and would spray kids with the foam for fun. At that time the general public did not know of the danger but perhaps the manufacturers did.

mona manx, Neighbor

Doylestown, PA|2h

Leigh Greeny

You couldn't have been drinking it for decades. You were told not to drink it about 1986.

-----Original Message-----

From: beckdebeck@aol.com

To: malucca@aquaamerica.com <malucca@aquaamerica.com>

Cc: investorrelations@aquaamerica.com <investorrelations@aquaamerica.com>; ra-dhpressoffice@pa.gov <ra-dhpressoffice@pa.gov>; publicrelations@abingtonhealth.org <publicrelations@abingtonhealth.org>

Sent: Sun, Feb 27, 2022 8:22 pm

Subject: PADEP Proposes 'Unprecedented' 14 and 18 ppt PFAS Drinking Water Standard USEPA limit is 70 ppt

February 27, 2022

Dear AquaPA President Lucca,

Are the carbon filtration and reverse osmosis manufacturers driving this political science boondoggle?

Do you remember the Dioxin bogeyman craze of the 1980s? It died a quiet death-unlike the Ukrainian President Yushchenko who was given 2 grams of it by the Russians in 2004 and he developed Chloracne but did not die as predicted by the anti-Clorox crowd.

"Following an assassination attempt in late 2004 during his election campaign, Yushchenko was confirmed to have ingested hazardous amounts of TCDD, the most potent dioxin and a contaminant in Agent Orange. He suffered disfigurement as a result of the poisoning, but has since made a full recovery."

Viktor Yushchenko - Wikipedia

David Beck
Cheltenham Township, PA
BS Environmental Engineering Syracuse University

boon·dog·gle
/'boʊn,däg(ə)l/
noun

- **1.work or activity that is wasteful or pointless but gives the appearance of having value:"writing off the cold fusion phenomenon as a boondoggle best buried in literature"**

verb

- **1.waste money or time on unnecessary or questionable projects:"the only guarantees are higher taxes and bureaucratic boondoggling"**

Where did the word "boondoggle" come from? - HISTORY

Politics & Government

PA Proposes 'Unprecedented' PFAS Drinking Water Standard

<https://patch.com/pennsylvania/abington/s/i55ox/pa-proposes-unprecedented-pfas-drinking-water-standard>

The state is considering a step it's never taken in its history in an effort to keep drinking water safe and clean.



Justin Heinze, Patch Staff

Posted Sun, Feb 27, 2022 at 7:13 pm ET

Reply



(Shutterstock)

PENNSYLVANIA — A new drinking water health standard has been proposed in Pennsylvania that officials are hopeful will protect residents from PFAS, long-lasting chemicals used in certain products that leak into the groundwater. The step is described as "unprecedented" as Pennsylvania has never set a state-level specific limit for a substance in drinking water.

The new rule would set a maximum contaminant level of 18 parts per trillion for perfluorooctane sulfonic acid (PFOS) and 14 perfluorooctanoic acid (PFOA). Both are stricter than the U.S. Environmental Protection Agency's ruling of 70 ppt.

Pennsylvania leaders say they are at the forefront of limiting PFAS in drinking water.

"Since Governor Tom Wolf signed an executive order in 2018, DEP has worked tirelessly to protect Pennsylvanians from these chemicals," DEP Secretary Patrick McDonnell said in a statement.

A 60-day public comment period began on Saturday for residents to evaluate the new proposal.

"This public comment period allows stakeholders to share their feedback and concerns as we continue to put the safety and health of Pennsylvanians first," McDonnell added. PFAS have been used since the 1940s to make products resistant to water and heat such as cookware, carpets, furniture fabrics, and more.

The science of how PFAS impact human health is still emerging.

Advocates and organizers have been pointing to their consequences for some time, particularly where they believe clusters of illness have emerged, such as at Naval Air Station Willow Grove in Montgomery County.

A series of virtual public hearings on the new rules will be held next month via Webex on the Pennsylvania Department of Environmental Protection Agency's website.

- Monday, March 21, 2022, at 1:00 PM
- Tuesday, March 22, 2022, at 6:00 PM
- Wednesday, March 23, 2022, at 1:00 PM
- Thursday, March 24, 2022, at 9:00 AM
- Friday, March 25, 2022, at 9:00 AM

To submit a comment, email RegComments@pa.gov or [write through the DEP's website here.](#)