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**Kathy Cooper**

**From:** ecomment@pa.gov  
**Sent:** Tuesday, March 8, 2022 3:56 PM  
**To:** Environment-Committee@pasenate.com; environmentalcommittee@pahouse.net; regcomments@pa.gov; Troutman, Nick; gking; Franzese, Evan B.; Eyster, Emily; IRRC c-jflanaga@pa.gov  
**Cc:**  
**Subject:** Comment received - Proposed Rulemaking: Safe Drinking Water PFAS MCL Rule (# 7-569)

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MAR - 8 2022

**Independent Regulatory Review Commission**

**Re: eComment System**

**The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Safe Drinking Water PFAS MCL Rule (#7-569).**

Commenter Information:

Kari Pohl  
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 952 Franklin Ave. Rear  
 Aliquippa, PA 15001 US

Comments entered:

Dear Pennsylvania DEP,

Admittedly, I'm not sure how I feel about state Maximum Contamination Levels (MCL) for perfluoroalkyl and polyfluoroalkyl substances (PFAS) in drinking water. The MCL for PFAS should be ZERO!! Unfortunately, the only way to address the threats posted by PFAS contamination is for PFAS to be removed from drinking water through treatment, and that can't happen without an MCL being set.

I encourage you to make sure the proposed MCL for PFAS:

- Implements more protective standards- The proposed MCL standards for PFOA (14ppt) and PFOS (18ppt) are not strict enough. The PFOA MCL should be as low as possible but not to exceed 6 ppt and the PFOS MCL should be no greater than 5 ppt. When PFOA and PFOS are found combined in water, their combined concentration should be no higher than 13 ng/L. These recommendations are based on toxicological risk assessments.
- Expands the compounds covered- MCLs should be set for more PFAS compounds, especially those DEP sampled for and found at some level within the state's environment. That includes PFNA, PFHxA, PFHxS, PFHpA, and PFBS.
- Requires rapid implementation- Do away with monitoring delay in the proposed rulemaking

whereby initial compliance monitoring for water systems serving a population of greater than 350 persons begins January 1, 2024 and initial monitoring for water systems serving a population of less than or equal to 350 persons begins January 1, 2025. All systems included in the rulemaking should be required to start sampling immediately.

- Ensure rigorous and ongoing monitoring- Sampling should be required annually for all systems with no waivers for any systems. For systems with detections above the MCLs, monthly sampling should be required until the level is reduced below the MCL, then quarterly monitoring should be allowed before returning to the annual requirement.
- Ensures equal protection for all- The proposed rulemaking only applies to Public Water Systems. This leaves a large number of Pennsylvanians out of the sampling. All water supplies, including individual private water wells, should be included.

Thank you for taking action to help address the major exposure route to PFAS in Pennsylvania. Please address my concerns outlined above to ensure we get greatest protection that can be attained from exposure to PFAS compounds. I urge you to act as the Department of Environmental Protection and not as the Department for Enabling Pollution.

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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Jessica Shirley

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