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Kathy Cooper

From: ecomment@pa.gov
Sent: Wednesday, March 16, 2022 7:36 AM
To: Environment-Committee@pasenate.com; environmentalcommittee@pahouse.net; regcomments@pa.gov; Troutman, Nick; Glendon King; Franzese, Evan B.; Eyster, Emily; IRRC
Cc: c-jflanaga@pa.gov
Subject: Comment received - Proposed Rulemaking: Safe Drinking Water PFAS MCL Rule (# 7-569)

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MAR 16 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:

Joanne Stanton
Co-Founder Buxmont Coalition for Safer Water (joanne@buxmontwater.org)
614 Hammersmyth Court
Harleysville, PA 19438 US

Comments entered:

Subject- Safe Drinking Water PFAS MCL Rule [52 Pa.B. 1245]

It's urgent that state level Maximum Contamination Levels (MCL) for perfluoroalkyl and polyfluoroalkyl substances (PFAS) in drinking water are adopted, as contamination of drinking water grows and Pennsylvanians remain exposed. The only way to address this threat is if PFAS is removed from drinking water through treatment, which requires that an MCL be set. I encourage you to make sure the proposed MCL for PFAS:

- 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.
- 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.

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.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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