



Stephen Hoffman

From: ecomment@pa.gov
Sent: Monday, March 21, 2022 3:01 PM
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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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:

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Comments entered:

Verbal Testimony re. Safe Drinking Water PFAS MCL Rule Public Hearing
 1:00 pm, March 21, 2022

Tracy Carluccio – Deputy Director – Delaware Riverkeeper Network, Bristol, PA.
 Thank you for the opportunity to testify on the proposed rulemaking today. Delaware Riverkeeper Network supports the greatest protection that can be attained for the public from exposure to PFAS compounds. We are here to support that Pennsylvania move ahead to establish and enforce MCLs for both PFOA and PFOS and to do so as quickly as possible.

We have changes we recommend to the proposed rulemaking and we will be submitting written comment regarding these changes, which I will briefly discuss.

First - The proposed MCL standards for PFOA (14ppt) and PFOS (18ppt) are not strict enough to protect our youngest populations. The PFOA MCL should be 1 ppt but not to exceed 6 ppt and the PFOS MCL should be no greater than 5 ppt -- when both found, the MCL should be no higher than 13 ppt. Because PFOA and PFOS are linked to developmental effects, they should be removed to as low a level as possible. The exposure values used to arrive at the EQB's proposed MCLs do not sufficiently protect infants, young children or the fetus because it would allow those

populations to be exposed to PFAS levels that studies show would have immunotoxic effects and/or lead to developing correlated disease later in life.

Also, even though we don't consider the MCL Goals (MCLGs) that were recommended by the Drexel Group to be sufficiently protective, we protest that DEP is recommending higher MCLs than the MCLGs derived by Drexel - 8 ppt for PFOA and 14 ppt for PFOS. DEP relaxed these standards rationalizing that cost must be a considered factor. There are real health and lifelong costs paid for the exposure of people to PFAS and they are borne by individuals, by families, by communities. How can the EQB recognize the often devastating adverse health effects of people being exposed to PFOA and PFOS and the benefits of protection afforded by treating drinking water to remove them and then dumb down the standards because of the cost of implementing the regulations? To fulfill its statutory and constitutional responsibility to provide clean drinking water, MCLs must be protective of the public's health, first and foremost, and should be based on chronic lifetime health effects, not implementation costs. This is wrong and violates the requirement that PA must provide pure water under Article 1 Section 27 of the PA Constitution.

Secondly - MCLs should be proposed for more PFAS compounds, at least including all 8 of the PFAS compounds that PADEP found in the state's water. Drinking water sampling found 8 different PFAS compounds, PFOA and PFOS being the most common - they must be included in this rulemaking. But we know there are health effects linked to other PFAS that were found. DEP should be including them all - these are highly toxic compounds and they don't belong in our water.

If the full list of PFAS found in Pennsylvania is not included in the rulemaking process, at the very least DEP should include the 7 PFAS that the Drexel Group assessed in their analysis. That includes PFNA, PFHxS, PFHpA, PFBS, and GenX (HFPO-DA). The risk assessment was done by Drexel and MCLGs recommended. Why leave them out?

Furthermore, we know from the Pilot Health Study done in 2018 in Bucks and Montgomery Counties around the military bases where firefighting foam has contaminated the drinking water, that the average levels of PFOA, PFOS, PFHxS and PFNA among participants of the study were higher than the average levels reported at the national level, inducing tremendous concern for the community. We know that not only PFOS and PFOA but also another 2 of the compounds that the Drexel group assessed and recommended MCLGs for were found in 79% of all the people whose blood was tested - PFHxS and PFNA. In fact, the highest exceedance level was for PFHxS and was found in 94% of those tested. All 4 of these PFAS compounds showed up in people's blood, this is an undeniable health crisis. What is the excuse for DEP not to include at least all of these four? These PFAS are accumulating in people's bodies in PA, they have known adverse health effects, they must be removed from drinking water.

I am out of time but we will be expanding in our written comment on our grave concern that private water wells are excluded from this rulemaking; that the MCLs need to be implemented much faster than is proposed; more sampling needs to be done, yet the monitoring and sampling proposed is grossly inadequate and riddled with loopholes that will allow systems to avoid continued sampling, which endangers the public; and other issues.

Thank you for the opportunity to comment.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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