



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

My name is Barbara W. Brandom. I am a retired physician, I have lived in Plttsburgh, Pennsylvania for over 45 years. I often travel to Somerset County, Pennsylvania, where it is cooler than in Pittsburgh and the air is cleaner. However, in recent years I have more concerns regarding the environment throughout Pennsylvania. That is why I am speaking today about the need for stricter rules on polyfluoroalkyls (PFAS) and related chemicals. I used to think that these toxins were not common pollutants throughout Pennsylvania. But there was no evidence of widespread PFAS pollution only because PFAS had not been looked for everywhere. Now that we know that PFAS is a component of fracking fluid there is reason to believe that it will contaminate groundwater wherever there are spills from wells, pipelines and compressor stations and wherever injection wells are located. There have been many instances when well casings cracked and pipelines spilled. There are many wells that have not been capped and so leak fluid continuously.

As I said to my neighbor in Somerset County, when our clean water is gone, we are done. We won't be able to drink the water or irrigate our vegetables without risk of serious disease. We won't be able to sell our property without giving serious risks to future inhabitants.

I already suffer from high cholesterol and thyroid disease. Must I expect to die from cancer induced by environmental toxins? Should I warn my family not to return to Pennsylvania because of inevitable exposure to PFAS, a toxin that accumulates up the food chain can not be removed once it is in a human body?

The Pennsylvania Department of Environmental Resources has published a proposed rule to require maximum contaminant levels (MCLs) in public water systems of 14 ppt for PFOA and 18 ppt of PFOS. Health effects is the first line item that is to be considered when setting a MCL. This is problematic because health effects such as excess cancers, are often delayed for years after exposure to toxins. Studies of exposure to benzene, a recognized carcinogen for which there should be no safe MCL

because its carcinogenic effects are recognized to be cumulative over a lifetime, showed increased risk of leukemia when the followup period was longer. The observation of no increased risk of cancer in 5 years after exposure is likely to be meaningless.

Estimated costs and benefits of a new rule are part of the rulemaking process. In the case of toxic environmental exposures, estimation of cost will likely be short sighted; the costs of testing and communicating results, possibly cleaning up pollution rapidly. It may take years to show reduction in adverse health effects, but these are of critical significance to the lives of people in polluted communities. It is not clear in the proposed rulemaking document how these cancer risks have been assessed and incorporated. PFAS and related compounds are toxic in very small doses. They should have been removed from drinking water many years ago. Cambridge Environmental Consulting recommended MCL of 1 ppt for PFOA. This is especially important for children.

This rule will be applicable only to public water systems. In Pennsylvania at least 3.5 million people obtain their drinking water from wells that are not connected to public systems. Twenty thousand new independent water wells may be drilled each year. These families also need to know if their water is contaminated. In Bucks and Montgomery Counties the PFAS Pilot Health Study found higher levels of PFAS in private wells than in the public water system.

We need;

**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.

**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.

**Expansion of 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.

**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 as soon as possible in 2022.

**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 this opportunity to speak.

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