



Testimony for PFAS MCL Proposed Rulemaking
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Members of the Environmental Quality Board:

The Environmental Health Project (EHP) is a data-driven public health organization headquartered in Pittsburgh. We are a skilled group of public health professionals, community educators, and data analysts who have become national leaders in the comprehensive understanding of public health consequences of shale gas development (SGD). EHP has a decade of community science experience, working directly with frontline residents concerned about how their health has been, or may be, impacted by SGD.

I am here today to express our unequivocal support for the creation of drinking water standards regarding PFOS (18 ppt) and PFOA (14 ppt). The creation of standards for PFAS chemicals will better protect public health and save the lives of many impacted residents.

In 2021, Physicians for Social Responsibility discovered evidence, through EPA documents, showing that PFAS or PFAS precursors have been used in oil and gas development, thereby creating risks for oil and gas workers and the public through multiple potential pathways of exposure.²

PFAS are a class of manmade chemicals that can contaminate soils, surface, and groundwater, and drinking water sources. Because PFAS do not break down in the environment or in the human body, they can accumulate in animal and human tissues. Research has also proven that PFAS are highly toxic. According to ATSDR, exposure to PFAS may lead to health impacts, including liver damage, increased risk of high blood pressure or pre-eclampsia in pregnant individuals, decreased birth weights, and kidney and testicular cancer.

[The Oil and Gas Threat Map](#) shows that in Pennsylvania there are 1,552,201 people living within a half-mile radius of 107,717 oil and gas facilities. These people represent about 12% of Pennsylvania's population. The number of residents who live, work, and play near oil and gas facilities in Pennsylvania illustrates the magnitude of impact water contaminated with PFAS can have on residents.

It is because of the highly toxic nature of the PFAS chemicals and the magnitude of associated health risks that EHP strongly supports the proposed DEP standards for regulating PFAS in drinking water within Pennsylvania. EHP also urges the DEP to continue to examine other PFAS chemicals, which similarly have been shown to cause negative health impacts. This could include chemicals such as perfluorobutyrate (PFBA) and perfluorohexanoic acid (PFHxA).

With over 6,000 chemical compounds in the PFAS family, the DEP should consider expediting the creation of additional regulations. The DEP should also consider the idea of regulating chemicals as a class as opposed to one by one. The field of toxicology tells us that the toxicity of a mix of chemicals can be understood by adding the toxicity of all the components together (i.e., additivity). Additivity allows us to understand how the presence of multiple chemicals can interact in the environment as well as inside a person. Sometimes the toxicity of the mix of chemicals is antagonistic, meaning the toxicity combined is less than the sum of all the parts. However, there are also some cases where the toxicity can be synergistic, meaning the components combined make each other more toxic.⁴ It is important to look at the big picture of all the PFAS chemicals that need regulating because they do not exist in a vacuum and often are found in combination with others. Regulating these chemicals one at a time is not practical if protecting Pennsylvanians' health is the goal.

In addition to regulating PFAS chemicals as a class, the DEP should consider widening the scope of PFAS sampling. The PFAS Sampling Plan conducted by the states PFAS Action Team focused its sampling on military bases, fire training schools/sites, airports, landfills, manufacturing facilities, and state hazardous cleanup sites. While these are valid and important sites to monitor, new research regarding the use of PFAS in oil and gas development operations indicates a need for further sampling in residential areas. EHP urges the DEP to consider their response to residents who desire testing and what the protocol and process will be for responding to such requests. Further, the DEP needs to consider how remediation efforts will be addressed when contamination is confirmed, since this can be a costly endeavor for individuals and water companies alike.

EHP supports the adoption of Safe Drinking Water PFAS MCL Rule, further urges the DEP to consider the extra steps mentioned previously to protect the health of Pennsylvanians and ensure access to clean drinking water for all.