



Stephen Hoffman

From: ecomment@pa.gov
Sent: Monday, April 25, 2022 7:48 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:

Andrew Christy
 (andb52@gmail.com)
 1624 Huntingdon Road
 Abington, PA 19001 US

Comments entered:

We live in Montgomery County and are extremely concerned by the contamination of our drinking water from the nearby air base. The standards proposed by DEP are a welcome start, but in their current form they are insufficient to protect water quality in Pennsylvania to ensure that our water becomes fit for human consumption in light of the extensive PFAS contamination.

Last year, water testing showed the following results for our house:

Perfluorooctane sulfonic acid: 5.7 PPT
 Perfluorooctanoic acid: 6.5 PPT
 Perfluorobutane sulfonate: 3.8 PPT
 Perfluoroheptanoic acid: 3.2 PPT
 Perfluorohexane sulfonic acid: 5.1 PPT
 Perfluorohexanoic acid: 8.1 PPT

In total, these levels were 32.4 PPT. Under the proposal from DEP, only two of these six contaminants would be subject to maximum contaminant levels. That is unacceptable given the known health implications of a wider variety of PFAS. At a minimum, each and every one of these six contaminants—as well as those found at other residential sites in Pennsylvania—must

be subject to MCLs.

In addition, the MCLs as set are too high. Levels of 18 PPT for PFOS and 14 PPT for PFOA would mean that our water as tested above would fall well below the MCLs. Yet our water is not safe to drink by an objective measure, as there is no safe level of PFOS, PFOA, or the other PFAS detected in our water. The individual and combined concentrations of these chemicals should be far lower.

We support the levels suggested by the Pennsylvania Public Interest Research Group, which wrote:

“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.”

As a result of this contamination to our drinking water, we spent nearly \$2,000 on a water filtration system for our house. A whole-house system was required so that we do not water our vegetables and other plants with polluted water, thus spreading the contamination around our land or in the food we will eat. It will cost several hundred dollars every year to replace the granular activated carbon tanks.

We are lucky to be able to afford to filter our water so that it can be safe for human consumption. Most households cannot afford that expense. We urge DEP to require Aqua to properly filter our county’s water.

Finally, we also want to bring your attention to Article 1, Section 27 of our state Constitution, which unequivocally affirms that we have a right to “pure water.” The Commonwealth serves as a “trustee of these resources,” and must “conserve and maintain them for the benefit of all the people.” As our Supreme Court has explained, this provision places an affirmative obligation on the state to protect our environment. We urge our state government to abide by its constitutional obligation and protect all Pennsylvania residents.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

Jessica Shirley
Director, Office of Policy
PA Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063
Office: 717-783-8727
Fax: 717-783-8926
ecomment@pa.gov