

## HORSHAM TOWNSHIP

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RECEIVED

APR 27 2022

Independent Regulatory  
Review Commission

April 26, 2022

Mr. Patrick McDonnell, Chairman  
 Environmental Quality Board  
 Department of Environmental Protection  
 P.O. Box 8477  
 Harrisburg, PA 17105-8477

**Re: Proposed Rulemaking: Safe Drinking Water PFAS MCL Rule (#7-569)**

Dear Secretary McDonnell,

Since 2014, Horsham Township has been at the epicenter of the public's concern over the impact of per- and polyfluoroalkyl substances (PFAS) on human health and the environment. Past use and releases of PFAS compounds at military bases in Horsham Township led to contamination of the groundwater used by public water suppliers and private citizens for drinking water. Levels of perfluorooctane sulfonic acid (PFOS) and perfluorooctanoic acid (PFOA) in the local aquifer were well above the Lifetime Health Advisory Levels set by the U.S. Environmental Protection Agency (EPA).

Prompt and effective leadership by Horsham Township elected officials, assisted by U.S. Department of Defense (Navy and Air National Guard), PENNVEST and numerous other Commonwealth of Pennsylvania elected officials and agencies has resulted in Horsham Township now being a model on how to respond to PFAS groundwater contamination. We promptly established a goal of "Non-Detect" for PFOA and PFOS in our drinking water and are constantly meeting that goal.

As the proposed rule states, the benefits associated with reductions of PFOA and PFOS in drinking water are related to reduction in adverse human health effects. While the full effects of exposure to these forever chemicals continue to be learned by scientists and regulators, it is not too soon to set the maximum containment levels (MCLs) to "Non-Detect". Horsham Township has shown that it can be done using current technology. As the knowledge base improves with newer and more cost-effective treatment schemes, the 'Horsham Standard' will be more achievable throughout the Commonwealth.

Horsham Township strongly recommends that the Environmental Quality Board establish MCLs for PFOA and PFOS at "Non-Detect".

Sincerely,

A handwritten signature in blue ink, appearing to read "W. T. Gildea-Walker".

William Gildea-Walker  
 Township Manager