



April 27, 2022

Secretary Patrick McDonnell  
Pennsylvania Department of Environmental Protection  
Rachel Carson State Office Building  
400 Market Street  
Harrisburg, PA 17101

**RE: Safe Drinking Water PFAS MCL Rule (#7-569)**

Dear Secretary McDonnell,

On behalf of the Sierra Club Pennsylvania Chapter's over 100,000 members and supporters across the Commonwealth, we appreciate the opportunity to comment on Pennsylvania's Safe Drinking Water PFAS MCL Rule (#7-569).

Too many Pennsylvanians are unknowingly dealing with unsafe drinking water that has been contaminated by PFAS chemicals (per- and polyfluoroalkyl substances). These chemicals have been linked to some cancers such as testicular, kidney, liver and pancreatic, weakened childhood immunity, low birth weight, and endocrine disruption. Many drinking water systems in Pennsylvania have been found to be contaminated, including the Willow Grove Naval Air Station, which was found to have PFAS and PFOA contamination as high as 86,000 ppt in 108 of the 161 wells on-base and public wells near the base had contamination of up to 1,000 ppt. These levels far exceed the lifetime health advisory (LTHA) level established by the EPA for two PFAS in drinking water: perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS). The LTHA level is 70 parts per trillion (ppt) for PFOA and PFOS combined.

The full extent of PFAS contamination in Pennsylvania still remains unknown, but based on PFAS contamination in other states, we expect additional wells and ground water near airports, fire training centers, and industrial sites to be contaminated.

As such, we're writing to submit our comment and those of residents throughout Montgomery, Bucks, Lehigh, and Northampton Counties for the record on the proposed rulemaking to Chapter 109 that will set maximum contaminant level levels for perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS). While I am thankful that the Department of

Environmental Protection is establishing a long overdue rulemaking for PFAS specific to Pennsylvania, the proposed rule has far too many loopholes to protect public health and we urge the PA DEP to enact more stringent standards that provide equal protection for all Pennsylvanians' drinking water. These recommendations for strengthening the rule include:

1. Broadening the coverage to include the dozens of PFAS chemicals currently being excluded by this proposal, including PFNA, PFHxA, PFHxS, PFHpA and PFBS.
2. Reducing allowable contamination levels in the current proposal to protect public health. No level of PFAS exposure is safe. DEP should set maximum levels below 6 ppt for both PFOS and PFOA.
3. Closing the exemption for private well water, which would leave 3.5 million Pennsylvanians at risk of contamination from "forever chemicals."
4. Requiring wells and water companies to test yearly for forever chemicals. If a water system tests positive for PFAS, they should be required to test monthly until contamination levels drop.

**Pennsylvanians should not be afraid to turn on the tap.** Please strengthen the proposed rule to protect all Pennsylvanians from the dangers of PFAS chemicals.

Thank you kindly for your consideration of these comments,

Rachel Rosenfeld  
 Online Organizer  
 Sierra Club, Pennsylvania

First Name	Last Name	City	County	State	Zip	Personal Message
Mariann	Oconnor	Willow Grove	Montgomery	PA	19090	
Brett	Myers	Green Lane	Montgomery	PA	18054	
Caryn	Leifer	Horsham	Montgomery	PA	19044	
Ellen	Cohen	Ardmore	Montgomery	PA	19003	
Tom	Gauntt	Bensalem	Bucks	PA	19020	
Anne	Keys	Collegeville	Montgomery	PA	19426	
Cynthia	Narkoff	Souderton	Montgomery	PA	18964	
Katherine	Abel	Lake Como	Wayne	PA	18437	
Leslie	Marsden	New Hope	Bucks	PA	18938	

Michael	Burger	Croydon	Bucks	PA	19021	
Ruth Kay	Souder	Red Hill	Montgomery	PA	18076	
Jim	Lenhart	Macungie	Lehigh	PA	18062	I live near Emmaus and I also have a well for my home's water supply and I am very worried about these forever chemicals
John	Cairns	Lansdale	Montgomery	PA	19446	
Sarah	Fulton	Allentown	Lehigh	PA	18102	
Regina	Milipne	Plymouth Meeting	Montgomery	PA	19462	
Richard	Van Aken	Holland	Bucks	PA	18966	We must start somewhere in addressing the plethora of forever chemicals and the sooner the better. I support creating a pool of money derived from either a tax of the profits of companies making these chemicals or taxing companies making products using these chemicals to address the resulting problems from their use such as water pollution. The public shouldn't be left holding the bag as is usually the case.
Stamatina	Podes	Bensalem	Bucks	PA	19020	Every individual deserves the right to have clean drinking water !!!
Tracy	Nice	Perkasie	Bucks	PA	18944	Clean drinking water is so important to everyone! Please think about future generations and their need to access clean drinking water!
Betsy	Levy	Wynnewood	Montgomery	PA	19096	
James	Liu	Easton	Northampton	PA	18045	
Charles	Zafonte	Macungie	Lehigh	PA	18062	
Cindy	Paetow	Quakertown	Bucks	PA	18951	
Slobodin	William	New Hope	Bucks	PA	18938	Clean water is an essential human need as well as for all living species. Please take the right steps and enact strong

						regulation. Thank you.
Leonard	Cohen	Jenkintown	Montgomery	PA	19046	My family can no longer use the water from our tap as it is contaminated with PFAS chemicals. When are we going to get water that is safe to drink?
David	Combs	Allentown	Lehigh	PA	18104	I grew up in Montgomery County very close to the Naval Air base in Willow Grove that has been found to have extremely high levels of PFOA and PFOS in the surrounding communities' drinking water. I am worried for my health and the health of my family as a result and not having been aware most of my life. Members of my family have had cancer and I am very concerned for the future. Please ensure that the new rule has the strictest possible measures to make sure that families like mine are protected.