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Form LTRF 634-645

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PFAS Form Letter Master List

MAY - 9 2022

Form Letter F: "Equal Protection from PFAS"

Independent Regulatory
Review Commission

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

Dear Department of Environmental Protection Commissioners,

I am writing today to submit my comment for the record on the proposed amendments to Chapter 109 that will set maximum contaminant level goals and maximum contaminant levels for perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS). I am glad that the Department of Environmental Protection is establishing a long overdue maximum contaminant standard rule for PFAS specific to Pennsylvania. However, I urge the DEP to enact more stringent standards that provide equal protection for all Pennsylvanians' drinking water.

The maximum contaminant standards of 14 parts per trillion for PFOA and 18 parts per trillion for PFOS do not do enough to protect human health. A toxicological analysis by Cambridge Environmental Consulting recommended a standard of 1 part per trillion for PFOA and 5 parts per trillion for PFOS in order to protect young children rather than setting the standards to standards that only take into account adult exposure.

It is the responsibility of this Board to take into account all Pennsylvanians, including young children and members of rural communities who do not get their water supplies from the Public Water Systems. As written, these standards would exclude private water wells. Nearly 3.5 million people get their water from water sources that are not connected to public systems. To ensure that private water users are not ingesting PFAS and to avoid burdening rural areas the cost of testing their own water for contaminants, the DEP needs to institute rigorous and regular testing for all PFOA and PFOS compounds in private and public water sources.

PFAS are called "forever chemicals," because they stay in the water that they pollute and can move through the fish and wildlife that take them up. PFAS also find themselves in the blood of individuals who have been exposed. It can be highly toxic even at very low doses and has been linked to kidney cancer, thyroid disease, pregnancy-induced hypertension and preeclampsia and testicular cancer. It is imperative that we act now to protect our communities against these devastating outcomes.

I would like to see the protection of drinking water in Pennsylvania to be equitably distributed throughout private and public systems and for the standards to take into account the health of the most vulnerable Pennsylvanians.

Thank you for your consideration.

Sincerely,