



**Stephen Hoffman**

**From:** ecomment@pa.gov  
**Sent:** Monday, March 28, 2022 4:03 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:

Melissa DelMonego  
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Comments entered:

Dear Decision Makers -

Recently I became aware of the issue of PFAS chemicals in drinking water and the DEPs plans to address regulations on behalf of the citizens of PA to ensure greater protection of our most valuable resource, clean, healthy drinking water. I am appreciative of your efforts given the outdated standards set by the Environmental Protection Agency. I am writing to request that you set the highest standards possible based on toxicology testing and results that have been received by various reputable organizations such as Cambridge Environmental Consulting, PEATT Study in Bucks and Montgomery County, and Drexel PFAS Advisory Group. The side effects of these "forever chemicals" in drinking water are extremely alarming and this is going on without citizens' knowledge. The Pennsylvania Constitution provides that each citizen has a right to clean and safe drinking water (Article 1, Section 27, Pennsylvania Constitution) and organizations such as the DEP are entrusted with upholding that sacred right. We should be doing everything possible to limit these chemicals from getting into the water supply to begin with, but certainly, should understand what has already happened and take action to correct the situation accordingly.

Specifically, I request that the following points be included in the proposed MCL for PFAS:

- Equal protection for all. The proposed rulemaking only applies to Public Water Systems. This leaves a large number of Pennsylvanians, including residents with private wells, out of the sampling. All water supplies, including individual private water wells, should be included. It cannot be assumed there is minimal exposure of private water users to PFAS without knowing, through sampling, the quality of individual wells and the location of all the possible sources of PFAS. As evidence that individual private wells are at risk of PFAS contamination, the PFAS Pilot Health Study ("PEATT Study") in Bucks and Montgomery Counties reported that people with private wells had higher levels of PFAS in their blood than those on public water supplies.

- Implement more protective standards. The proposed MCL standards for PFOA (14ppt) and PFOS (18ppt) are not strict enough. 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 and are lower to assure the protection of children. As explained by Cambridge Environmental Consulting: "...[the] use of adult default exposure values to determine a maximum contaminant level (MCL), younger children would not be protected since younger children dose intakes would exceed the allowable RfD."

- Expand the compounds covered. MCLs should be set for more PFAS compounds, especially those DEP sampled for and found at some level within the state's environment. If the full list of PFAS found in Pennsylvania is not included in the rulemaking process, at the very least DEP should include the PFAS that the Drexel PFAS Advisory Group (DPAG) assessed in their analysis and report. That includes PFNA, PFHxS, PFHpA, PFBS, and GenX (HFPO-DA). These compounds have known health effects and should be included in the regulations.

- Rapid implementation. I do not understand the rationale for testing delay. We know the compounds, we know the impacts, and there is no reason we can't start implementing the testing immediately. Delaying compliance monitoring for water systems serving a population of greater than 350 persons until January 1, 2024 and water systems serving a population of less than or equal to 350 persons until January 1, 2025 is putting citizens at risk. The DEP should act immediately.

- Rigorous and ongoing monitoring. Sampling should be required annually for all systems with no waivers for any systems. For systems with detections above the MCLs, monthly sampling should be required until the level is reduced below the MCL, then quarterly monitoring should be allowed before returning to the annual requirement.

I thank you for taking action to address the safety of water for all Pennsylvania citizens and I urge you to lead in this regard and make Pennsylvania an example of what can be done to set itself apart when advocating for its citizens. When it comes to clean drinking water and the health of citizens, nothing is more important. These policies impact each and every one of us. I hope you will address my concerns outlined above to ensure we all receive the greatest protection that can be attained from exposure to PFAS chemicals.

Thank you,

Melissa G. DelMonego  
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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Jessica Shirley

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