



May 18, 2016

The Honorable Tom Wolf
Governor, Commonwealth of Pennsylvania
Sarah Galbally, Secretary of Policy and Planning
Office of the Governor
225 Main Capitol Building
Harrisburg, PA 17120

Re: Response to your letter re. Perfluorinated Chemicals in Pennsylvania

Dear Governor Wolf and Ms. Galbally,

Thank you for your letter of April 15 in response to our concerns expressed in our letter of March 23. We are writing to provide further information about perfluorinated compounds (PFC) and about our concerns regarding the ongoing PFC contamination of drinking water in Pennsylvania, particularly Bucks County.

To be clear, we consider the research that has already been done to provide enough scientific evidence to set a drinking water standard for Perfluorooctanoic acid (PFOA) and Perfluorooctane sulfonate (PFOS), based on health effects. The short term health advisory that has been set by U.S. Environmental Protection Agency (EPA) does not reflect the up to date scientific findings and should not be used as a trigger for action. As a result, the advisory level, as we discussed previously, is inadequate to protect from short term exposure and is wholly inappropriate for exposure longer than a few days. In fact, as discussed in our previous letter, even EPA has recommended a stricter standard to protect those who are drinking water contaminated with PFOA in different states, setting up inconsistent and confusing advice for various communities across the nation. EPA is expected any day to issue a long term health advisory which should be very helpful to the States in grappling with this issue and deciding at what concentration PFOA and PFOS are dangerous so action can be taken to prevent people from drinking water that endangers their health and their children's health. But this is not going to be enough to provide the protection Pennsylvania needs.

Regarding your statement that EPA should provide treatment options, New Jersey Drinking Water Quality Institute has already conducted extensive research and analysis of the best treatment systems available to remove PFCs from water and has published this data on their website:

DELAWARE RIVERKEEPER NETWORK
925 Canal Street, Suite 3701
Bristol, PA 19007
Office: (215) 369-1188
fax: (215) 369-1181
drm@delawareriverkeeper.org
www.delawareriverkeeper.org

<http://www.nj.gov/dep/watersupply/pdf/pfna-pfc-treatment.pdf> There are water providers who are currently using carbon filtration to remove PFCs successfully. The treatment is not new and is proven to be effective and safe. Unfortunately, EPA has been lagging behind the science and technology on PFCs which is why some states have taken action to address the pollution problem on their own. This is what we recommend that Pennsylvania do, rather than wait for EPA.

We support your position that a federal drinking water standard that is protective of all populations be adopted by EPA. However, the agency has not stated that they will propose a regulation to adopt a maximum contaminant level (MCL) upon which states can base a safe drinking water standard. They have stated they will issue a long-term health advisory level but that is only an advisory. It will be a benchmark upon which action can be taken but we urge the Pennsylvania Departments of Health and Environmental Protection to perform due diligence towards the adoption of a safe drinking water standard for Pennsylvania. Vermont, New Jersey and other states are taking that action based on occurrence and levels of concentration unique to their states, which is what we need in Pennsylvania.

We are concerned that the drinking water contamination in the region around the former Willow Grove Naval Air Station in Horsham Township and the Naval Air Warfare Center in Warminster in Bucks County, caused by the release of firefighting foams to the environment and groundwater, is still not adequately addressed in Horsham, Warrington and Warminster Townships. We are alarmed **that these military facilities are still using firefighting foams containing these compounds and other dangerous PFCs** such as PFHxS (Perfluorohexanesulfonate) and PFNA (perfluorononanoic acid). Considering that the distribution of PFCs has not ceased, we advocate in the strongest possible terms that these PFC compounds immediately be taken out of use.

On an emergency basis, bottled water or other alternative clean water supplies should be provided to those who are now drinking water with concentrations that exceed safe levels. Some people are still drinking water contaminated with PFCs, could still be exposed to these toxics in the environment such as soil, air, and other media, and the source of these compounds has not been curtailed since the foams are still in use and PFCs are so durable that they do not break down in the environment, continuing to pollute. As a permanent solution, drinking water sources need to be treated to a non-quantifiable level so that all traces of these toxic compounds are removed from potable water. Then the areas that are contaminated need to be mapped and comprehensive environmental and water studies done to accurately identify where these compounds are now and where they are moving towards and how to remove them for the environment.

We are advocating that Pennsylvania step out on its own to investigate the presence of PFCs in drinking water across the Commonwealth (a statewide occurrence study) and immediately supply safe, clean water in the areas identified in the UCMR3 database, which includes Doylestown Township and Harrisburg locations (in addition others locations for other PFCs) as per the UCMR3 data. In fact, since the PFOS and PFOA levels found in the water in Bucks County are among the worst in the nation,¹ it seems clear that your Administration must take action on its own to protect public health, not rely solely on the EPA.

As we stated in our previous letter, data from the court-ordered C8 Health Panel and the C8 Health Project in West Virginia, related to the Dupont facility there, concluded that PFOA is linked to Kidney

¹ <https://www.epa.gov/sites/production/files/2015-09/ucmr-3-occurrence-data.zip>

Cancer, Testicular Cancer, Thyroid Disease, High Cholesterol, Pregnancy-Induced Hypertension/Preeclampsia, and Ulcerative Colitis.² In addition to the six diseases with probable links, the study also verifies probable links to decreased birth weight and decreased response to vaccines. A report reviewing all of the studies on low birth weight concluded that PFOA does reduce human birth weight³. These are very serious health effects; most vulnerable are fetuses, infants, and children, making this need for action extremely urgent.

As mentioned in our previous letter, Governor Andrew Cuomo of New York, Governor Peter Shumlin of Vermont and Governor Maggie Hassan of New Hampshire called on the federal government to fully fund the Drinking Water State Revolving Fund and the Clean Water Revolving Fund and to make polluters accountable for their actions and provide funding to address this contamination issue. Is this something you will do?

You did not respond to our concern that responsible parties must be identified a task that State agencies will likely have to take on. In addition to the problem that the water replacements and treatments being paid for by the military in the area around the Bucks County bases (\$3.9 million dollar agreement reached between Warminster Municipal Authority and the Navy) are probably not nearly enough because they had identified a limited area based on an inadequate action level (EPA short term health advisory), we are concerned that the manufacturers and chemical companies that invented PFCs such as Dupont and 3M need to be brought in but we have not heard any public reports that this is happening.

We support that health analyses are being done and that cancer registry investigations are underway by the ATSDR. These are critical analyses that need to be done to find out how these compounds have impacted residents and workers who have been exposed to the water and environment in the contaminated region. We hope that human blood of residents who have been drinking this water and living near or working on land that has been highly contaminated is sampled and studied as part of a health impact assessment.

We know you support that action should be taken and we know you are working with EPA but we urge you to do more today, despite what EPA does, due to the extremely high levels of these toxic compounds in drinking water here. We have outlined herein some actions we urge you to take to address this ongoing and growing contamination issue.

Thank you for your response to our previous letter and thank you for your consideration of our ongoing concerns.

Sincerely,



Maya van Rossum
the Delaware Riverkeeper



Tracy Carluccio
Deputy Director

² <http://www.c8sciencepanel.org/newsletter10.html>

³ <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC4181929/pdf/ehp.1307893.pdf>