



July 11, 2018

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**TESTIMONY of Tracy Carluccio  
Deputy Director, Delaware Riverkeeper Network  
to Pennsylvania Department of Environmental Protection (DEP) re.  
Hazardous Sites Clean-Up UNDER THE ACT OF October 18, 1988  
NOTICE OF PROPOSED INTERIM RESPONSE  
Ridge Run PFAS HSCA Site, East & West Rockhill Townships, Bucks County  
July 11 Public Hearing  
West Rockhill Township, Bucks County**

Delaware Riverkeeper Network (DRN) presents this testimony regarding the proposed clean-up of per- and poly-fluorinated alkyl substances (PFAS) above the US Environmental Protection Agency's (EPA) Health Advisory Limit (HAL) combined concentration for Perfluorooctane sulfonate (PFOS) and Perfluorooctanoic acid (PFOA) of 70 nanograms per liter (ng/L) or parts per trillion (ppt).

We have a few points to make today:

First, we do not agree that applying the EPA HAL of 70 ppt is reasonable or protective and using it can mask how much contamination actually exists. In June, the federal Agency for Toxic Substances and Disease Registry (ATSDR) released "minimum risk levels" that reduce the level at which no harm can be expected from exposure down to approximately 7 ppt for PFOS and 11 ppt for PFOA. PFAS is highly toxic and linked to devastating disease such as cancer. Even miniscule concentrations in drinking water can have adverse health effects. Additionally, other states are considering safe drinking water standards that are many times lower than the EPA HAL and more in line with ATSDR's findings.

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New Jersey, for instance, is going to adopt mandatory maximum contaminant levels (MCLs) of 14 ppt for PFOA and 13 ppt for PFOS, dropping the trigger in that state for mandatory treatment by all water suppliers to a much lower and more protective level.

Finally, DRN filed a formal petition with Pennsylvania's Environmental Quality Board (EQB), asking that they set a MCL for PFOA of 1ppt or no greater than 6ppt. The EQB accepted our petition last year and is currently considering setting a MCL. We recently brought to the EQB's attention the final recommendation and findings of the NJDWQI for a MCL for PFOS and submitted DRN's report prepared by an independent toxicologist recommending a MCL of a maximum of 5 ppt or "non-detect" for PFOS.

Based on the most recent science, the trigger for remediation and water replacement for people should be either at non-detect or no greater than 5 ppt for PFOS and between 1 and 6 ppt for PFOA. You refer in your presentation here tonight to identifying 12 wells with PFCs in this area. However, the summary of groundwater sampling that you provided for review shows many more than 12 wells with detections of PFOA and PFOS above 5 or 6 ppt, singly or combined. Using these levels as triggers increases the number of wells that require treatment and substantially changes DEP's evaluation and the cost analysis – both the total cost and the distribution of the capital costs of treatment. This is especially true if PFAS is detected in more wells as sampling continues.

DRN supports DEP's proposed Alternative 4, the piping in of public contaminant-free water, to provide the protection needed. Extending the public water system could be coupled with Alternative 3 by immediately installing whole house filtration systems or continuing the use of bottled water until the piped system is operating. The installation of whole house filtration systems could be used in combination with Alternative 4 to cover outlier wells that are outside the area that would be reasonably served by the extension of the existing water system. Extending the water system and using the bottled water or whole house filters in the meantime will provide immediate long-term relief for an already impacted community.

However, Alternative 3's condition of turning the systems over to the homeowners after 1 year is unacceptable and unfair. The systems should be monitored and maintained by DEP or the responsible party in perpetuity.

DRN supports that action be taken by DEP as swiftly as possible to address the groundwater contamination in the Ridge Run area. The public and DEP are well aware of the highly toxic properties of PFAS and the threat these compounds represent to human health. Contaminated drinking water is the major source of ingestion of PFAS. Because there are numerous individual water wells and at least two – now closed - public water supply wells that are known to be contaminated at this site, because the source of the contamination has not been conclusively defined, because the groundwater aquifer is known to contain the compounds and because these compounds do not break down in the environment but persist indefinitely and can spread over time, because PFAS builds up in peoples' blood, increasing the risk of harmful health effects, and people here do not know how long they've been exposed and at what level, it is critical that action be taken on urgent footing to protect public health and the environment.

Regardless of the solution, it is vitally important that the environmental cleanup of the pollution commences in tandem with the drinking water solution and the source be found and the responsible party be made accountable. That would provide a truly permanent solution.

Thank you for the opportunity to comment on this important contamination issue and thank you for taking action to remedy this egregious pollution problem.