

**DEPARTMENT OF ENVIRONMENTAL PROTECTION**

Hazardous Sites Cleanup Program

RESPONSE TO PUBLIC COMMENTS

**Benner Township PFAS Investigation**

October 6, 2022

DEP provided a public comment period concerning the selection of the prompt interim response for the Benner Township PFAS Investigation. A public notice was listed in the *Pennsylvania Bulletin* on Saturday, May 14, 2022. A public notice was also listed in the *Centre Daily Times* newspaper on Sunday, May 15, 2022. The Administrative Record was available for public review both on the public project web page at [Benner Township HSCA Investigation \(pa.gov\)](http://Benner Township HSCA Investigation (pa.gov)) and at the Benner Township Municipal Building located in Bellefonte, PA. Written comments were accepted during the comment period which extended from May 28, 2022 to August 26, 2022 and written and oral comments were presented at the public hearing conducted on June 28, 2022 at the Benner Township Municipal Building. Oral comments have been excerpted from the public hearing transcript, and a complete transcript of the oral comments is available for review on the project webpage located at [Benner Township HSCA Investigation \(pa.gov\)](http://Benner Township HSCA Investigation (pa.gov)). DEP has compiled all comments received during the comment period or at the public hearing from the following individuals.

1. Terry Cable, Benner Township Resident  
Representing: Concerned Residents of Walnut Grove Estates and the surrounding Benner Township PFAS Expanded Investigation Area  
1437 Majestic View Dr  
State College, PA 16801
2. David Thomas Roberts, Benner Township Resident  
1995 Valley View Rd  
State College, PA
3. Rick Weyer, Benner Township Resident  
1835 Walnut Grove Dr  
State College, PA 16801
4. Rolen Ferris, Bobby Rahal Honda  
6 Penns Way Rd  
Mechanicsburg, PA 17050
5. Nancy Cord Baran, Benner Township Resident  
338 Big Hollow Rd  
State College, PA 16801
6. John Kostas, Benner Township Resident

215 Aster Ave  
Bellefonte, PA 16823

7. Kevin Hulburt, Benner Township Resident  
1436 Majestic View Dr  
State College, PA 16801
  
8. Gary and Jane Brubaker, Benner Township Residents  
480 Big Hollow Rd  
State College, PA 16801
  
9. Lee Copper, Benner Township Resident  
1841 Walnut Grove Dr  
State College, PA 16801
  
10. Greg and Cheryl Bartram, Benner Township Residents  
1412 Majestic View Rd  
State College, PA 16801
  
11. Gene Stocker, Benner Township Resident  
1864 Walnut Grove Dr  
State College, PA 16801

Each comment, the source or sources of the comment identified by number, and DEP's response are listed below.

COMMENT #1: (submitted in writing following oral comment given at public hearing)

Many residents are still waiting on initial well test results in order to be able to access the prompt interim response resources provided by PADEP (that is, bottled water, whole house filtration and public water). It is my understanding that there was an issue with the laboratories used for testing. When will the well test results be available? Are the completed residential well test results invalid or is there an issue with the previous laboratories' test results? (Commenter #1)

RESPONSE #1:

*Testing of residential wells has been ongoing as availability of approved laboratories allows. As of September 19, 2022, 84 residential samples have been collected. At this point in time, all those residents requesting samples be collected have been sampled or scheduled for sampling, as DEP continues to get requests. All samples collected have been analyzed by accredited laboratories. There are no issues with results from previous or current testing.*

COMMENT #2: (submitted in writing following oral comment given at public hearing)

How does the PADEP intend to respond to the updated guidelines lower than the EPA's HAL of

70 ppt? The new EPA interim guidelines of 4 ppt for PFOA, PFOS include new chemicals PFBS and Gen-X. Any exposure to these chemicals would indicate a health risk to residents and that includes nearly all the wells tested in the newly expanded Benner Township PFAS Investigation Area. Given that PADEP has based its actions on the previous non-enforceable EPA guideline of 70 ppt, how will the EPA's new interim guidelines impact the proposed new enforceable standard in Pennsylvania at 14 ppt for PFOA and 18 ppt for PFOS for these residents during this prompt interim response period? (Commenter #1)

RESPONSE #2:

*The Act 2 Statewide health cleanup standard, also known as the Medium-Specific Concentration (MSC), of 70 ng/L is currently in effect. If a new standard comes into effect, DEP will evaluate what that means to the selected prompt interim response. Also, please note that the EPA interim HAL is 4 parts per quadrillion (ppq) for PFOA and 20 ppq for PFOS, not ppt as the commenter states. The EPA HALs for PFBS and GenX in drinking water are not interim and therefore were immediately adopted by DEP's Act 2 regulations.*

COMMENT #3: (submitted in writing following oral comment given at public hearing)

Given the recently updated guidelines from the EPA, that is 4 ppt is it possible to make bottled water and whole house water treatment available to all residents within the newly Expanded Benner Township PFAS Investigation Area? While we wait for Pennsylvania to adopt an enforceable MCL level of 14 ppt and 18 ppt for PFOA and PFOS respectively, many of my neighbors are not included in the DEP's current efforts. In addition, it is my understanding that at least one well has demonstrated the variability of PFAS levels from one testing date to another. The GAT-1 well was tested on June 19, 2021 with a PFAS result total combined of 73.0 ppt and then was tested again on August 6, 2020 with a result of 116 ppt. Several residents would be over the 70 ppt if future tests had similar fluctuation in results. Because of the changing standards at the federal and state levels, variability of test results, and PADEP's current inability to provide prompt test results to residents, it seems reasonable to offer this interim response to all residents within the newly Expanded Benner Township PFAS Investigation Area. (Commenter #1)

RESPONSE #3:

*It is important to recognize that PFAS is a commonwealth-wide (nationwide and worldwide, too) issue and that all residents of the commonwealth need to be treated in a fair and equitable manner. It is not feasible to provide alternate water supplies to residents commonwealth-wide who might be equally near a PFAS plume, but meet the current standard, therefore DEP relies on the Act 2 cleanup standards to make its decisions. DEP recognizes the data variability that may be present in groundwater testing results and has been, and will continue, resampling wells that do not meet the current standards to determine how much the results are changing and if the plume is moving. To date, home well samples in this investigation, with one exception, show less variability than in the monitoring well referenced in the comment. DEP is further investigating the one well with highly variable results. The issues with getting samples conducted and returned from the laboratories have been resolved and should not pose an issue going forward.*

COMMENT #4: (submitted in writing following oral comment given at public hearing)

One resident received an email indicating a whole-house filtration system installation plan (Point of Entry Water Treatment or POET system) will be developed in the next few weeks. My understanding is that residents above 70 ppt will be receiving a granular carbon POET system. After installation, PADEP will then cover the expense for testing the POET to verify the system produces safe drinking water. Coverage of all expenses including maintenance of these systems will be either a) be covered by an identified responsible party or b) covered by the PADEP for a two-year period after which residents will be responsible for these costs. The POET system has no ability to measure affective and ongoing safe treatment; that requires water testing. What time period is reasonable after the POET system is installed to confirm a laboratory water sample is at or below the acceptable safe drinking water standards? If facilities are not available to do the testing now, how will I know if my whole-house filtration system is failing without a PFAS laboratory sample? Who is responsible for disposing of contaminated filters or the granulated carbon? (Commenter #1)

RESPONSE #4:

*Testing will be conducted by DEP following installation of all POET systems to ensure the systems are adequately mitigating PFAS levels. Frequency of follow-up testing may vary as we evaluate results at a given residence. DEP will be performing maintenance and sampling of the POET systems until a final response is put into place. Should the final response be continued operation of the POET systems, recommendations will be made by DEP and its contractors to provide guidance for testing, operation and maintenance of the systems on an ongoing basis. The contractor who changes out carbon filtration material once it becomes saturated would be responsible for the transport and disposal of that material.*

COMMENT #5: (submitted in writing following oral comment given at public hearing)

Residents falling below the 70 ppt on the initial round of water testing are requesting information about the POET systems with a detailed summary of how these systems are safely maintained, costs associated with installation's water testing to ensure the systems are functioning and time intervals for required water testing to determine if there is a contaminated filter. Some residents want to install a POET filtration system in their home at their own expense for wells that tested positive for PFAS, but fall under the HAL of 70 ppt. (Commenter #1)

RESPONSE #5:

*Once DEP's contractors have designed the appropriate POET system, this information can be shared with any resident who wishes to install a system but does not meet DEP's installation criteria.*

COMMENT #6: (submitted in writing following oral comment given at public hearing)

What information can you currently provide regarding identifying and securing public water and public sewer for the neighborhood? Ultimately, this seems the only option to ensure safe drinking water for residents and to ensure that these chemicals are not reentering the water table through septic drain fields that are already contaminated with PFAS. (Commenter #1)

RESPONSE #6:

*DEP has begun discussions with multiple water authorities that serve the area to evaluate the feasibility of extending a public water supply line and determine the final response action. Public sewer would not be provided by DEP as the primary focus of this phase of the investigation is the provision of safe drinking water for residents impacted by the PFAS plume.*

COMMENT #7: (submitted in writing following oral comment given at public hearing)

Residents are highly concerned about the potential and inevitable downgrading of property values due to PFAS. The GTAC7-4-106 Benner Township Due Diligence Summary Report-June 2021 has confirmed a source of PFAS at University Park Airport. Unless Pennsylvania Army and Air Force National Guard (PAANG) is also a source, it appears a source has been identified. What actions, if any, will PADEP take to identify the source of the contamination hazard of PFAS? (Commenter #1)

RESPONSE #7:

*DEP has identified multiple potential sources for the known PFAS plume in Benner Township. DEP has reached out with requests for historical documents indicating any use of PFAS-containing materials during operations at the following properties: Canon Instruments located on High Tech Road; Matreya, Inc. located on High Tech Road; State of the Art, located on High Tech Road; PA Air National Guard Station located on Minuteman Lane; Centre County Airport Authority located on Fox Hill Road; and the University Park Airport located on Fox Hill Road. Information obtained during our investigation will be evaluated to determine which companies utilized, stored, produced, tested, or obtained PFAS chemicals during operation. This documentation, in conjunction with on-site soil and groundwater sampling, will be used to identify any potential source(s) of PFAS contamination.*

COMMENT #8: (submitted in writing following oral comment given at public hearing)

Equally concerning to the residents is the knowledge that we have been living with PFAS undetected and the potential health implications of elevated levels in our blood stream are unknown. That is why blood serum tests need to be conducted for all residents, family members, co-habitants, significant others, etc., to establish a PFAS blood serum baseline for those within the newly Expanded Benner Township PFAS Investigation Area. (Commenter #1)

RESPONSE #8:

*Blood serum testing is something that DEP neither performs nor is qualified to evaluate. Any questions regarding testing of blood serum should be directed to the PA Department of Health.*

*They can be contacted at 717-787-3350 and further information may be found at [www.health.pa.gov/topics/envirohealth](http://www.health.pa.gov/topics/envirohealth).*

COMMENT #9: (submitted in writing following oral comment given at public hearing)

Was PFAS discovered anywhere around the airport prior to 2019? (Commenter #1)

RESPONSE #9:

*DEP is not aware of any such discovery.*

COMMENT #10: (submitted in writing following oral comment given at public hearing)

Have there been any soil samples tested and if so when, where and what were the results? (Commenter #1)

RESPONSE #10:

*Two rounds of soil testing have been performed by DEP and its contractor, and additional sampling will be performed in the future. To date, samples were collected on 2/22/22 and 8/25/22 at the locations shown on the map attached as Attachment I. The results received so far are included in Attachment II.*

COMMENT #11: (submitted in writing following oral comment given at public hearing)

The Benner Township PFAS Investigation area is currently poorly studied and has not been clearly defined through comprehensive testing and data analysis. There is a lack of publicly disclosed data from the multiple agencies and institutions collecting data on the Benner PFAS contamination. There must be a more clearly defined and expanded investigation area as part of the Interim Response. Additional water, soil, and air test data is needed along with information on test sites, aquifer test depths, aquifer geological and hydrogeological properties, surface water samples, PFAS test within Pennsylvania State University owned and operated University Park Airport's stormwater and wastewater retention areas, expanded soil tests across the impacted investigation zone, and investigation of historic contamination events. Such measures will help more clearly define the contamination areas and the extend of the groundwater plume, soils contamination, and surface water contamination for the establishment of a science based investigation in Benner Township. (Commenter #2)

RESPONSE #11:

*DEP's ongoing investigation has included gathering information on historical contamination and collecting various environmental samples including water supply wells, groundwater wells, springs, surface soil and subsurface soil. DEP's first priority was to identify residents whose water supply wells were impacted. Future plans include geophysical testing, installation of groundwater monitoring wells and soil borings, and collection of surface water samples. DEP remains committed to using the best science-based approach to this investigation.*

COMMENT #12: (submitted in writing following oral comment given at public hearing)

The environmental and public health impacts of PFAS contamination within the commercial and industrial areas have not been adequately addressed. There is concern that the use of contaminated well water at businesses and industries that discharge wastewater to sanitary sewer contributes to PFAS compounds entering the local wastewater stream without removal processes in place at the wastewater plants. PFAS compounds may then enter biosolids that are used locally for crop and field fertilization and may also enter local surface water at the waste plants effluent discharge point. Treatment devices must be provided at the well discharge of these contaminated commercial and industry water sources to prevent the downstream spread of PFAS into our environment that has negative health impacts to both humans and ecological systems. (Commenter #2)

RESPONSE #12:

*There are currently no requirements for treatment of wastewater effluent for PFAS in Pennsylvania.*

COMMENT #13: (submitted in writing following oral comment given at public hearing)

Initial detection of PFAS contamination was in 2019. Over three years have elapsed. Interim and long term remediation must be vigorously implemented within a clearly defined investigatory zone established through expanded PFAS testing in the soils, surface waters, and groundwater. Confirmation of high levels of PFAS contamination has not led to a level of testing necessary to adequately determine the extent of the PFAS plume. (Commenter #2)

RESPONSE #13:

*The nature and extent of contamination must be understood before an effective remediation system can be designed. Additional testing is necessary, as stated in comment 11, to understand the contamination, and DEP's investigations are ongoing. In the meantime, DEP has been supplying mitigation measures, bottled water and designing POET systems to address any ongoing drinking water exposure.*

COMMENT #14: (submitted in writing following oral comment given at public hearing)

Benner Township residents and local environmental groups are very concerned with the extent of the plume as outlined previously and request expanded PFAS testing in multiple areas. (Commenter #2)

RESPONSE #14:

*DEP is also concerned about the groundwater plume and has therefore been performing an investigation. The investigation has expanded as more data has become available and will continue to be adjusted as warranted by the ongoing investigation.*

COMMENT #15: (submitted in writing following oral comment given at public hearing)

The old EPA Health Advisory levels of 70 ppt for PFOA and PFOS are no longer in effect. The new EPA advisory levels have been reduced by several magnitudes from 70 ppt for PFOA and PFOS to 0.004 ppt for PFOA and 0.02 ppt for PFOS. The residents of Big Hollow have already received levels of PFOA and PFOS that far exceed the new EPA lifetime exposure guidelines. In order to adequately protect public health of our neighbor's families and children the PADEP interim response measures must now recognize and adopt the new EPA Lifetime Drinking Water Health Advisories in the Benner Township PFAS response criteria. There is an evident need for water treatment systems to be provided at all water supply wells within the Big Hollow community when the contamination levels are viewed through the lens of the new EPA guidelines. The new EPA PFAS guidelines are based on multiple rigorous science studies with the goal to limit negative health outcomes from lifetime exposure to toxic PFOA and PFOS. (Commenter #2)

RESPONSE #15:

*The PFOA and PFOS advisories that EPA issued in June 2022 are interim HALs. They are termed interim in part because the science behind them is not settled and our understanding is that EPA's advisory board is still reviewing the science used to develop the standards. As mentioned above, DEP cannot supply water systems to all residents in the area as our decisions are driven by the current standard in effect.*

COMMENT #16: (submitted in writing following oral comment given at public hearing)

It is apparent that not all affected properties, businesses, and families with groundwater supplies have received PFAS tests or test results. PFAS testing must be expedited and expanded. (Commenter #2)

RESPONSE #16:

*DEP has been collecting data as quickly as our contractors, contract laboratories, and staffing allow and has continued to expand the investigation as necessary.*

COMMENT #17: (submitted in writing following oral comment given at public hearing)

Local residents may have been exposed to toxic levels of PFAS for years if not decades. A more "prompt" prompt interim response is needed. (Commenter #2)

RESPONSE #17:

*DEP shares residents' concerns about this exposure and remains committed to sampling and providing alternate water supplies to residents above the standard as expeditiously as possible.*



COMMENT #18: (submitted in writing following oral comment given at public hearing)

Installation of public water supply line extensions and connections to homes, industries and businesses as alternatives to bottled water and home treatment systems entail large infrastructure projects at the cost of millions of dollars. The question arises as to who pays for such projects. There is around a billion dollars of Federal infrastructure grant money available for PFAS mitigation. We request PADEP to vigorously pursue Federal grant money for financing and implementing the final Benner Township response plan. There are further questions concerning the possibility of PFAS contamination in the public water systems proposed to provide potable public water. Expanded testing for PFAS must include public water supply sources and wastewater effluents which may be receiving downstream PFAS contamination. (Commenter #2)

RESPONSE #18:

*DEP will pursue all relevant funding sources if a waterline is to be installed, including state and federal funding and funding from responsible party(ies). A wide range of public water supplies have been tested by DEP. The results of the commonwealth wide study completed in 2021 are available at [https://www.dep.pa.gov/Citizens/My-Water/drinking\\_water/PFAS/Pages/default.aspx](https://www.dep.pa.gov/Citizens/My-Water/drinking_water/PFAS/Pages/default.aspx). Additional wells may have been sampled since this investigation. Any sampling of wastewater is outside the scope of the prompt interim response.*

COMMENT #19: (submitted in writing following oral comment given at public hearing)

Benner Township residents and the larger community within the Spring Creek Watershed and Bald Eagle creek Watershed request the continuation of a transparent process with continued public education, awareness, involvement, and input on decision making concerning the Benner PFAS response. (Commenter #2)

RESPONSE #19:

*DEP has been and remains committed to sharing information and being transparent throughout the process. As one step, DEP has continued to maintain an updated public website regarding this investigation. Please visit [www.dep.pa.gov/BennerHSCA](http://www.dep.pa.gov/BennerHSCA).*

COMMENT #20: (submitted in writing following oral comment given at public hearing)

As a proud alumni and former employee of Pennsylvania State University I sincerely hope that Penn State will follow all environmental laws and regulations to contain and remediate the PFAS contamination at the University Park Airport. As ask Penn State to acknowledge that their institutions have a responsibility and duty as a trusted partner and community member to implement comprehensive PFAS mitigation and remediation of the soil, air, groundwater, and surface water contamination that has occurred through the use of aqueous fire fighting foams at the University Park Airport. (Commenter #2)

RESPONSE #20:

*This comment was addressed to an entity other than PADEP and therefore DEP offers no response.*

COMMENT #21: (submitted in writing following oral comment given at public hearing)

Treatments such as carbon filtration, reverse osmosis, and ion exchange to remove PFAS from water supplies and wastewater effluents results in a concentrated toxic PFAS waste which must be handled and disposed of as a hazardous waste. New technologies are currently being tested that completely break down PFAS. Such new technology could potentially eliminate to a great extent the PFAS groundwater contamination plume in Benner Township. A pilot study is underway using a groundwater extraction, treatment, and re-inject process using ultraviolet light, sulfite, and iodine to safely and completely break down PFAS. This process does not leave behind concentrated PFAS contaminants that need further treatment or disposal and may be a viable means to remove the PFAS contamination from Benner's groundwaters. There is also ongoing research on the use of highly energetic vacuum ultraviolet light with a wavelength of less than 200 nanometers to completely break down PFAS compounds with no remaining toxic residual. Such new technologies must be evaluated and considered as part of DEP's long-term planning for PFAS removal. To be clear, standard household ultra-violet light systems are not at all useful to break down PFAS. Standard household ultra-violet light systems operate at a wavelength of light that does not contain the high energies necessary to break down PFAS. Household ultra-violet systems are however effective to treat biological contaminants such as bacteria. (Commenter #2)

RESPONSE #21:

*PFAS compounds have not been categorized as hazardous materials by EPA at this time, and therefore do not require disposal as hazardous waste. However, DEP's understanding is that EPA is working to adopt regulations that would consider PFOA and PFOS as hazardous materials. DEP is aware of numerous promising studies being conducted on new and emerging treatment technologies, however in our response actions we utilize only proven treatment technologies to ensure the safety of the recipients. DEP will continue to follow the development of the science around the treatment of PFAS and evaluate any proven remedial technologies that are developed.*

COMMENT #22: (submitted in writing following oral comment given at public hearing)

I understand that PADEP is considering some of the requests I have presented in my comments. I ask PADEP to seriously consider these comments and to implement the measures necessary to thoroughly determine the extent of the contamination plume and the many downstream PFAS impacts. I ask PADEP to expand efforts to determine the extent of PFAS contamination and to diligently continue working to mitigate the spread of PFAS in Benner Township and to the downstream communities and environments that are impacted by the PFAS plume. (Commenter #2)

RESPONSE #22:

*All comments received have been and continue to be given serious consideration. We appreciate the community's engagement in this process.*

COMMENT #23: (submitted in writing following oral comment given at public hearing)

As a resident of Benner Township I wish to see my friends and neighbors protected from PFAS contamination in their drinking and household water use water supplies and the associated negative health effects from long term PFAS exposure. Permanent removal of the PFAS from the groundwaters of Benner Township should be the ultimate goal of any mitigation and remediation plan. I also ask for Pennsylvania to request Federal infrastructure grant money to address the PFAS contamination in Benner Township. (Commenter #2)

RESPONSE #23:

*As mentioned in Response #18, there are numerous potential funding sources, including HSCA itself. DEP will pursue all relevant funding sources.*

COMMENT #24: (submitted in writing following oral comment given at public hearing)

Finally I wish to thank PADEP for holding this hearing and for their efforts to analyze and mitigate PFAS contamination in Benner Township. I also thank the Benner Township supervisors and staff for their efforts. There is much more work to be done and we must all pull together (Commenter #2)

RESPONSE #24:

*DEP appreciates this but recognize there is much more to do.*

COMMENT #25: (From transcript of oral comment given at public hearing)

So I want to thank my neighbors for addressing the group tonight more from a collective standpoint. I want to talk to you a little bit about my experience and how that connects with all the other people who are in the same boat as I am.

So my name is Rick Wier. I live at 1835 Walnut Grove Drive. My water well was tested twice by the DEP and the levels were 62 ppt and 53 ppt and PFAS contaminants were found in my water supply. My perception of this process is that it was rather lengthy.

Right? I think it's pretty natural I find it lengthy given the fact that my own drinking water has been potentially contaminated and they have been so for a very long time. This is an extremely important matter to me, and everybody here is a homeowner, and not only due to my own personal health concerns, but also an issue that impacts the value of my home, our surrounding environment.

I understand the DEP has a very hard job to do here and I trust they're performing to the best of their ability. However, given the outside's impact of this matter on all homeowners, communications associated with the process, the results, the outcome have not been consistent, comprehensive nor timely. Since my PFAS levels were on the borderline of the 70 ppt limit, I

have not received some of the instruction from the DEP that other homes with levels above the limit have received. This is disappointing to me for several reasons.

First, I suspect that there are margins of errors associated with any of these measurements. I don't know what those margins of errors are. Furthermore, I think all of my neighbors regardless of their levels should have been formed directly as what the DEP response would be, especially since this 70 ppt limit is no longer being recommending by the EPA.

The DEP should scrap the 70 ppt limit and embrace the reality that PFAS must be completely eliminated from drinking water. Absent any information from the DEP about near term remediation, I got none because I was not over 70. And given that my levels were sufficiently elevated, I didn't want to wait any longer than necessary to install a PFAS filtration system in my home. So I didn't wait. In addition, I took this action to install a filtration system in my home because the DEP provided no information to me on a long-range plan or series of options that are typically considered as a solution to this kind of contamination. I remain in the dark as to whether or not it would be possible to have these substantial expenses for this filtration system reimbursed by the DEP or some other responsible party if one is found.

I remain confused that the prompt interim response would not include some form of long-range set of impacts and options that homeowners will have available to them so that homeowner's can plan and take prompt action to protect themselves. Furthermore, little information has been provided by the DEP to indicate how will the investigation seek evidence of the source of contamination, who is the responsible party, who may that be and how the source can be remediated. To say that I'm disappointed in in the DEP in this regard, would be a major understatement.

Finally, I'm not at all clear on how this can be referred to as a prompt interim response given that in 2019, almost three years ago, a high level of PFAS contamination was found on the north border of the University Park Airport. It stands to reason, given the complex geology of the investigation area, that a high probability of PFAS contamination would exist along the southern border of the airport as well. It is adjacent to a residential neighborhood where all homes utilize groundwater wells. It is beyond comprehension that sampling in the neighborhood is not conducted immediately in 2019 by the DEP, nor demanded by Benner Township Supervisors. Thank you. (Commenter #3)

#### RESPONSE #25: well near standard

*As mentioned in response to the previous comments, DEP recognizes that data variability can and does occur in groundwater samplings. We have implemented resampling of many of the wells that are near, but below, the standard and so far, with one exception, have seen relatively small variations in the sample results. DEP resampled that location again to better understand the specific conditions and will share our conclusions about potential causes once they are developed. DEP will continue to institute resampling in the study area and, if the results of any well exceed the standard, make arrangements for an alternative water supply at that residence. The purpose of the hearing was to inform the community of response options that were being evaluated and get their input. In addition to the public hearing and DEP's attendance and discussion at the November 2021 Benner Township public meeting, DEP staff have also had numerous phone calls, emails and other communication with the residents to keep them informed.*

*Reimbursement of costs of treatment systems for homes that do not exceed the cleanup standards is something that DEP cannot do under current guidelines; however, if the standards change, the*

*possibility of reimbursement is something that would be evaluated. If a responsible party is determined, reimbursement is also something that could be discussed with them. With respect to the responsible party, DEP is still in the investigation phase. Beyond the HSCA letters referenced in the response to Comment #7, there is nothing else DEP can comment on as investigations at this phase are considered confidential. There appears to be confusion in the community as to what the term prompt interim response refers to within the HSCA regulations. The prompt interim response term applies to the time required to assist affected parties after the discovery of contamination--in this case, the provision of bottled water supplies to the community and planned installation of POET systems--and not to the investigation itself. We understand that the community is frustrated, and we remain committed to advancing the investigation as quickly as possible.*

COMMENT #26: (From transcript of oral comment given at public hearing)

Good evening, all, and thank you for allowing me to speak. My name is Roland Ferris. I represent Bobby Rahal Honda and while we are not currently property owners in Benner Township, we have a contract for a 48-acre farm, which we hope to develop and it is being impacted by a sewer that is impacted with the Walnut Grove. And the more I started researching this, the more concerned I got for the residents of Walnut Grove with this PFAS issue and the amount of time it's taken for it to be looked at.

My concerns about PFAS in this area, independent of my general concerns of the homeowners who have been drinking these chemicals are specifically how PFAS found in this investigation would impact future construction of sewer lines, interrupting all the soil, because I think sewer needs to be run to Walnut Grove, but we need, I would think to be very careful about interrupting as little soil as possible because most of that soil has PFAS in it, and we don't want to be spreading further. Okay?

My questions are, why no reduced amount of sewer line? Why not reduce the amount of sewer lines in that area when this does occur, thus, reducing the disturbance with PFAS. Why wasn't the public water considered in your examples of how to resolve this, bringing public water into place? Is there a widespread contamination of soils and would specific testing be required for any earth- disturbance activities in this area? There's quite a bit of it going on at the airport right now. And is all that dirt being tested because PFAS could be spread airborne.

Would the soil removed during excavation for sewer lines be a hazardous waste and need to be disposed of, or could it be backfilled in the ditches? Are there additional costs or concerns that need to be addressed when constructing a PFAS - when constructing in PFAS contaminated soils? What costs or time delays should be expected for Benner Township to provide planned sewer for this area?

In addition to the concerns specific to ongoing planning for providing sewer to my perspective property on Saddle Road. EPA recently announced drinking water health advisories for PFAS contamination in drinking water and a \$5 billion grant over a five-year period of a billion dollars a year to address PFAS and other emerging contaminants in drinking water. This is not just a local issue. PFAS is huge. If you start researching PFAS, there's a huge issue with Pittsburgh Airport on it. So everybody is going to be reaching out for this money, federal money, not just in PA, throughout the whole country. We should get to the front of the line.

Do these new lower health advisories impact DEP's future actions in Benner Township? Will the DEP or Pennsylvania or the HSCS apply for this \$5 billion? Who will be the people applying for it? And will any of the \$5 billion find its way here to folks?

Again, my concerns are for these homeowners. I think this is a very sad situation. I understand there's some health issues in that neighborhood, and I think the longer this goes on, the more of them there will be. Thank you for your time. (Commenter #4)

RESPONSE #26:

*Installation of sewer lines is not something proposed or evaluated by the prompt interim response, and therefore is not addressed in this comment response document.*

*Public waterline extension was not considered in the prompt interim response as it cannot be implemented quickly; please refer to the explanation of what constitutes a prompt interim response earlier in this document (Response #25). Installation of new water lines requires engineering evaluations and takes time and does not immediately address getting people a safe source of water for drinking and other residential uses. Public water is being considered as an option as part of the final response.*

*DEP has not found widespread soil contamination at this time; however, our investigation is ongoing.*

*Soil disturbed as part of the airport project is being tested.*

*As stated above in Response #18, DEP will pursue all available funding sources for this project. If new standards are adopted, then yes, it would impact this project in the sense that DEP would re-evaluate our investigation, mitigation, and remediation decisions in light of the new standards.*

*We cannot speak to how the federal government might distribute the funding mentioned, it is not something DEP controls.*

COMMENT #27: (From transcript of oral comment given at public hearing)

Yes. I didn't really prepare any remarks, but I just wanted to say how important this is. This is water. This is what we drink. This is what we wash our food with. This is what we bathe in. Our numbers were below the 70 part per trillion, but I didn't trust that it was okay. Like, how - who's saying, like, this much is okay for me to drink? So I've been buying bottled water. But it impacts everything. You don't know. You're in the bathtub, your skin is porous. You know, you're washing your teeth. You're giving water to your dog, watering your vegetable garden. You know, what's okay?

It's really, really upsetting and we are not in Benner Township. We're in College Township, so this is not just a Benner issue. We're right on the edge here. But when the numbers - the new numbers came out, I thought, okay, this is great. This is great; we'll get some help, because I've heard some people were getting, you know, water treatment and bottled water, but we're not. And I don't know if that will happen or when or how long. I don't know who's making these decisions. I've - it's just - it's just really, really upsetting. Water is life, you know? And it's really forever. It's not going to get better. It's not going to go away. Thank you.

RESPONSE #27:

*DEP understands the community's frustration that their water supply has been impacted and remain committed to working with the community to address the issue as quickly as possible while following the HSCA regulations and procedures.*

COMMENT #28: (From transcript of oral comment given at public hearing)

I'll sign up here or -.

Hello. My name is John Costas (*correct spelling is Kostas*). I would like to thank DEP for all their time and effort that they have put into this investigation and their continuing time and effort as the investigation goes forward.

I would ask DEP to go beyond this prompt interim response of ten homes that tested above 70 parts per trillion and extend the response to all residents that could be impacted by the plume. I ask this due to the variability of test results and the karst geology that underlies the investigation are.

DEP has been testing the old chemical burning site on Big Hollow Road since 2015 on a quarterly basis for PFOA and PFOS. You had the data from wet years to dry years on the variability of the concentration of PFAS at this site. I was told by DEP that the PFOA and PFOS concentrations have been fairly consistent with respect to time. I do not know how to quantify fairly, but I can assume that the concentration has changed. How do you explain to the resident of 1846 Walnut Grove Drive, whose well came in at 69 parts per trillion, that they are not entitled to the provisions of the interim response due to not reaching the holy grail of 70 parts per trillion?

State-of-the Art has been monitoring their wells on a quarterly basis since the fall of 2019. Does their data show a variability in the concentration of PFOA and PFOS? The most glaring example of variability is the GAT-1 Well at the University Park Airport. The well was tested initially on June 19th, 2020 and a combined value of PFOA and PFOS of 73 parts per trillion. The well was tested again on August 6, 2020 with the result being 116 parts per trillion. That is over a 40-percent difference in two months. How do you explain the discrepancy? Lab error? Rainy July? Dry July? How do you explain to a homeowner that their test result could be 40 percent different the next time it is tested?

I believe there is still insufficient data on how the plume is moving. I would like to bring to your attention an incident that occurred to a resident of Walnut Grove Estates. His well was tested on May 26th, 2016 for 1, 2-dibromoethane or EDB, for the result of 03.156 parts per billion, which is three times over the OSHA standard of 0.05 parts per billion. Two weeks later, on June 9th, 2016, his well was tested again at 0.03 parts per billion. How do you explain the discrepancy in such a short timespan? Could resident's PFAS concentrations rise and fall as quickly?

DEP has stated in this interim response that their primary concern is for human health of the residents and I applaud them for that. I ask them to overlook an arbitrary number of 70 parts per trillion and provide revisions of this interim response to all residents that could be impacted by this PFAS plume. Thank you. (Commenter #6)

RESPONSE #28:

*As stated above in response #3, while DEP understands the community's concerns, we have to use the recognized standard as our decision guide. Also as mentioned above, to date DEP has seen relatively little variation in the sample results, with one exception, although our resampling efforts are still ongoing.*

*DEP has not sampled the fire training site for PFAS, however the university has. The results have changed with time, you are correct.*

*We have reached out to the property owner of 1846 Walnut Grove residence multiple times in an attempt to schedule a resampling of their well. We were able to access the property in September to collect confirmatory samples. As stated above in previous comment responses, we have seen relatively little variation in the sample results from the home wells, with one possible exception, so far.*

*Investigation of EDB was not part of the proposed interim response and therefore this part of the question is not addressed in this response document.*

*The 70 ppt number is not arbitrary and is the current accepted Act 2 MSC.*

COMMENT #29: (submitted in writing via e-mail)

Below are a list of questions and concerns about the current response:

**Identifying recipients for this response:**

- 1) Many residents are still waiting on initial test results in order to be able to access the prompt interim response resources. When will these test results be available? It is my understanding that there was an issue with the laboratories used for testing. Can we get an update on the status of testing and a clear schedule for when timely test results will become available?
- 2) How does the PA DEP intend to respond to the updated guidelines from the EPA? These new guidelines indicate a health risk to any individual with any exposure to these chemicals and given that the DEP has based its actions on the previous EPA guideline, how will this impact the actionable standard for the state as well as the availability of resources to residents within our community during this prompt interim response period?
- 3) Given the recently updated guidelines from the EPA, is it possible to make bottled water and water treatment available to residents within geographic proximity to the airport? The EPA now recognizes the health risks to individuals exposed to any level of these chemicals. While I recognize that Pennsylvania is likely to adopt a lower enforceable standard soon, in the meantime, many of my neighbors do not have access to safe drinking water at this time and are not included in the DEP's current efforts. In addition, it is my understanding that at least one well has demonstrated the variability of levels from one testing date to another. The GAT-1 well was tested on June 19, 2020 with a result of a total of 73.0 ng/L and then was tested again on August 6, 2020 with a result of 116 ng/L. Several residents would be over the 70 ppt if future tests had a similar fluctuation in results. With the changing standards at the federal and state levels, variability of test results, and DEP's current inability to provide prompt test results to residents, it seems reasonable to offer this interim response to all residents within reasonable geographic proximity to the airport.

**Information on the in-house water treatment systems and cost burdens to residents:**

- 1) At this stage, I received an email indicating an installation plan will be developed in the next few weeks. My understanding is that residents above 70 ppt will then be receiving these granular carbon POET systems. After installation, the DEP will then cover all expenses for maintaining the systems and testing to ensure safe drinking water. This coverage of all expenses will continue until a final solution is decided. After that, expenses related to maintaining these systems will either a) be covered by an identified responsible party or b) covered by the DEP for a two-year period after which residents will be responsible for these costs. Is this an accurate summary of the current plan? And if so, when will we be provided with a detailed summary of how often



these systems need to be maintained, cost of such maintenance, and costs associated with water testing to ensure that the systems are functioning to provide safe water. My understanding is that the systems tend to have little to no ability to measure whether they are still effective, requiring water testing. In order to prepare for the possibility that this expense will eventually fall to us as residents, it would be very helpful to have a clear estimate of these potential costs.

2) Residents falling below the 70 ppt on the first round of water testing are also requesting information about the POET systems being installed as well as an installation plan. This would allow them to install the system in their own home at their own expense.

**State of the larger investigation:**

1) We would greatly appreciate a status on identifying a safe public water source for the long-term solution. What information can you currently provide regarding identifying and securing public water and public sewer for the neighborhood? Ultimately, this seems the only option to ensure safe drinking water for residents and ensure that these chemicals are not reentering the water table through septic systems. (Commenter #7)

**RESPONSE #29:**

*All property owners who were awaiting results have been contacted to schedule retesting. Those who have been retested were provided with results as they were received by DEP or will be in the future as we continue to receive testing results.*

*DEP is still working out how the new interim health advisory levels from EPA will affect our cleanups. When that is determined, DEP will re-evaluate our investigation, mitigation and future remediation efforts.*

*The issues with the lab have been resolved.*

*Yes, it is an accurate summary of the costs related to a POET system; however, installation of POETs may not be the final response. For instance, a water line may be selected as the final response, so there might not be a need for ongoing testing and maintenance. Upon installation of the systems, all residents will be supplied with information on care and maintenance of their systems.*

*Once the systems are designed, the information on their care and maintenance will be shared with all concerned residents on DEP's project webpage.*

*DEP has had initial discussions with water authorities in the area about supplying water to the Walnut Grove area. We are currently reviewing all pertinent information.*

**COMMENT #30: (submitted in writing via e-mail)**

On March 23, 2022 we had our water tested for PFOA, PFOS and PFBS. We received an email from John Ciccone on April 11 reporting the results were ND, not detected for all the chemicals. We have been following the test results from our neighbors and are very concerned that at some point in time the chemicals will reach our well water.

On June 16, I emailed John asking if we could be tested again and he replied,

*“We had our contracted lab run the analysis for the sample pulled from your pressure tank, and those were the results shared with you indicating a non-detect in your potable well water.*

*However, we do understand your concerns and we would like to conduct resampling at your residence. The DEP is continuing to sample residences within our investigation area, and we will reach out once we are provided with sampling date availability from the laboratory.”*

We feel this should also include future testing on a scheduled basis even if results continue to remain ND. Furthermore, we hereby go on record that when our water tests positive at or above the HAL, we want to be included in any and all mitigation actions that will be performed for those in the plume area that have positive results for the chemicals in their well water. This should include clean drinking water provided and installation of all approved filtration systems current at the time.

We have been satisfied with the DEP's actions on this matter thus far and will expect to be included in all future notifications and actions to resolve any contamination of our water supply. (Commenter #8)

**RESPONSE #30:**

*DEP's priority at this phase of the investigation is to determine which residents are impacted by the PFAS contamination and provide them with a safe source of drinking water. The first step was to collect first-time samples at properties to gather data to provide an extent of the contaminant plume. Following collection of these first-time samples, DEP has resampled and will continue to revisit previous sampling locations to confirm results from the original sample collection. Upon resampling, should any additional properties test above the current standard, they will be added to the response and provided with an alternate water source. Should the standards change, all previous data will be reevaluated to determine if any additional properties are impacted above the new standards.*

**COMMENT #31: (submitted in writing via e-mail)**

Here are some of the questions/concerns that I have.

1. Why did it take two years to identify that the residential drinking water wells adjacent to the airport as possibly being contaminated like the one on the North side of Fox Hill Road?
2. How long will it take before the PA DEP will adopt the new, full magnitude lower PAFS safety standards recently announced by US DEP?
3. How many (ballpark) years will it be before:
  - a. All affected residents have granulated carbon filtration systems installed and fully operational, and,
  - b. All affected residents are connected to a municipal water system free of PFAS?

I am sure there will be more questions, but I know that there is an August 26, 2022 deadline. With that deadline, when do you think the response will be published? (Commenter #9)

**RESPONSE #31:**

*When DEP first became aware of the contamination at the State of the Art facility in fall 2019, our first action was to determine if any additional water supply wells were being utilized adjacent to that property or in what was perceived to be the downgradient groundwater direction. As the investigation progressed, and as laboratory availability allowed, DEP expanded sampling to extend further outward from the known contaminant plume.*

*As of the date of this response, EPA's interim HALs remain interim and as of this time DEP's cleanup standards have not changed.*

*DEP anticipates that impacted residents will have filtration systems installed within calendar year 2022. A municipal water extension and hookups, if selected as a final remedy, will take longer due to the need to conduct a detailed engineering assessment and the coordination with relevant agencies and other entities.*

COMMENT #32: (submitted in writing via e-mail)

### **Are we the “new” Erin Brockovich and/or Flint, Michigan?**

My husband and I spent a long time looking for the perfect place to call home. Walnut Grove Estates is an area that is unique “almost a hidden gem.” The neighborhood is charming based on the number of homes and lot sizes, so you have privacy and feel very safe and secure. You only have one road in and one road out. The trees, wildlife, and Majestic View are additional benefits; but more importantly, the friendships we have developed with our neighbors and the sense of community really creates a specialness.

When we bought our home my oldest son, now twenty-one was three years old. My youngest son, now sixteen was not even born yet. Our home was an investment for our family. We wanted a place the kids would be able to have friends over to go swimming or have sleepovers, a big back yard for the dog, a place to entertain family events and friends; and as we aged, we would pass down our home to them. I am more than frustrated. Contaminated water is profoundly serious. My father was a Marine who was stationed at Camp Legume (*note: speaker likely was referring to Camp Lejuene*) during Vietnam. He suffered later in life with Parkinson's and mouth and throat cancer – all due to drinking contaminated water. Unfortunately, now my family needs to monitor our health for what might come due to these “forever chemicals.” Right now, we are receiving bottled water because our water is not safe, and our levels are high. Personally, anything above zero is high. And to add to that I am being required to permanently add contaminated water to my deed which drastically changes the value of my home due to negligent behavior that I had nothing to do with. We are still bathing, washing dishes, cleaning our clothes, and swimming in the pool. I am told our swimming pool cannot be evaluated due to the chlorine. As I appreciate the time being spent to determine interim and long-term resolution, the process needs urgency. Remember, you have known about this for at least three years, while the families in Walnut Grove Estates have been consuming the water. It is time for action. We would request that the EPA and/or DEP submit to all construction projects within the study area “cease and desist” if soil is to be moved or areas covered by permanent structures until soil samples can be obtained and tested in those areas. The residents of Walnut Grove Estates should not be subject to inhalation of dirt particles of the construction source if they contain PFOS elements. This will also help determine the location of the contaminants without it being disturbed or moved. Therefore, will also allow for remediation of those contaminants in the appropriate areas. Our neighborhood has endured plenty. The poison is in our bodies (men, women, young children, and pets). The unknown is yet to come for all of us living in Walnut Grove Estates.

Lastly, incident severity levels are a measurement of the impact an incident has on a business. Typically, the lower the severity number, the more impactful the incident. In this case, Walnut Grove Estates would be a incident, meaning “a critical incident with a very high impact.” **Our Quality of Life has changed** (Commenter #10)

RESPONSE #32:

*DEP is aware that the presence of PFAS compounds in private drinking water supplies in the Walnut Grove neighborhood is a cause of understandable concern. DEP shares concerns regarding the health and well-being of the residents and has been conducting the testing and investigation activities in accordance with our guidance, operating procedures and contracting process. The current prompt interim response is our solution to provide an alternate drinking water source to impacted residents until a final, permanent solution can be determined and completed.*

COMMENT #33: (submitted in writing via e-mail)

This is part of an email I received from the University today. I promised this person I wouldn't mention his name but I'm sure PaDep has access to this information. This is the kind of information that is upsetting. The PaDep web site states that soil samples in the ponds cannot be taken until technicians complete a list of FAA requirements involving a high security airport operations areas. This person told me otherwise:

“The stormwater retention ponds located **near** the airport are not considered a part of the Air Operations Area. Please contact the PA DEP regarding any questions you may have about the agency's plans and schedule for the testing near the airport, including at Pond 1A.”

This will not sit well with my neighborhood, nor should it.

Please forward this to your office and have them include it in the public comments being collected now and let us know when these ponds will be tested. (Commenter #11)

RESPONSE #33:

*When DEP approached the airport operator regarding sample collection, it was our misunderstanding at the time that any samples collected on airport property required the FAA access. Since that initial conversation, DEP discovered that the samples outside of the Active Operations Area (AOA) did not require the FAA certification and training, although sampling within that perimeter does and was also planned. DEP failed to edit that statement on the webpage for the project. As of the date of this response, surface soil samples from the ponds referred to, as well as additional areas within and outside of the AOA, have been collected and are awaiting laboratory analysis.*

COMMENT #34 Submitted via writing to the EHB.

### **PFAS CONTAMINATION IN WALNUT GROVE ESTATES SUBDIVISION**

Walnut Grove Estates (WGE) is a 67-acre subdivision of property with one-to-five-acre plots located south of University Park Airport (UPA) boundary. There are approximately 30

residential single-family homes within the subdivision and one undeveloped property. Two additional parcels are developed on Walnut Grove Drive entrance to WGE via Big Hollow Road access.

In 2018 Spring Benner Walker Joint Authority (SBWJA) announced a plan to sewer an area from Shiloh Road exit off I-99 to extend through Walnut Grove Estates with a connection to Fox Hill Road at the University Park Airport. After many hearings and submittals by the engineering firm of GD&F, Inc. the plan was approved by PADEP in April 2021. The decision by PADEP to approve the sewer plan was not popular with many of the residents of WGE because the development and areas within the Act 537 Plan were all in compliance of a Sewage Management Plan (SMP) adopted by Benner Township since 2014. Several residents of WGE were investigating the financial and logistical implications (F&LI) of the sewer extension into WGE and the Rock Road/Big Hollow Road areas.

In June of 2021 PADEP published the GTAC7-4-106 Benner Township Due Diligence Summary Report (GTAC7) that identified PFAS contamination in areas north of UPA runway 6/24 (RW6/24). WGE residents were unaware the PADEP report was sent via electronic communication to Benner Township, as there was no hard copy provided to the supervisors or the office staff for public view. It was only during the FL&I in the beginning of October 2021 WGE residents discovered the PFAS contamination issue from the GTAC7 publication. Three wells within a similar radius of RW6/24 were over the 70 ppt EPA HA. Previously in 2016 and through 2019 Gene Stocker's residence (1864 Walnut Grove Drive) well tested positive for Ethylene Dibromide (EDB) and there was no resolution in finding the source. In 1985, a water turbidity and contamination problem were identified by an adjacent neighbor at 1858 Walnut Grove Drive, and a lawsuit announcement in the Centre Daily Times between the homeowner and Penn State University (PSU) ensued. The lawsuit

identified PSU lands at UPA as the location of the source. The results were in favor of the homeowner.

On January 19, 1996 Pond 1A and surrounding area was inundated with floodwater that caused a catastrophic event on Walnut Grove Drive that washed out the roadbed from eighteen inches to forty-eight inches in some locations. The engineer's report is included with this submittal. Photos of other flooding events containing turbidity, substantial damages and erosion with outflows into Big Hollow Stormwater basin are shown. It is evidence that the migratory nature of PFAS could be present in these locations.

There was no effort by PADEP to investigate areas south of RW6/24 containing acreage in and adjacent to WGE and Detention Pond 1A, a stormwater runoff collection system from UPA RW6/24 and the Pennsylvania Air and Army National Guard facility (PAANG). Furthermore, the SBWJA sewer extension pathway was located through Pond 1A which raised a red flag for PFAS migration with the soil's disturbance. Sinkholes in the UPA Karst Topography and possible fracture trace map is attached.

Having great concern for the previous history of stormwater runoff from the direction of UPA, Mr. Stocker contacted Cheryl Sinclair and inquired about WGE well water testing for

PFAS.

*Gene*

*10/17/2021 3:47 PM*

*To Cheryl Sinclair*

*Do you have any core sample testing completed yet for the PFAS? Are your intentions to check the wells in our neighborhood? Do you have any idea when that may occur? EDB is a group 2 Carcinogen, that's worrisome enough and now we have to deal with PFAS. We do have reasons to worry and I know you are working hard to provide the information we need.*

*Thanks*

*Gene Stocker*

The Stocker residence well was sampled in December of 2021 and the results were reported in February of 2022; PFOA + PFOS equaled 194.8 parts per trillion (ppt). The EPA Health Advisory (HA) is 70 ppt. Three other WGE resident well tests for PFAS were reported at that time, below the EPA HA. At this time Mr. Stocker requested that all residents of WGE have their wells tested for PFAS. One of the adjacent properties on the other property boundary of Mr. Stocker was not tested on 2/7/2022 however, the result was PFOA + PFOS equaled 195.0 parts per trillion (ppt). One property in the same cul-de-sac tested not detected (ND) in February of 2022 but later in August of 2022 a second test result was PFOA + PFOS equaled 196.8 parts per trillion (ppt). This anomaly of ND results has proven to be a red flag and the follow-up testing is always positive for PFAS and some results are above 70 ppt.

Soils testing for PFAS contamination was also requested for Pond 1A and the area of the Big Hollow Stormwater Basin that follows Big Hollow Road, because the sewer extension project preliminary layout was identified in that basin.

PADEP proceeded with more private well water samples in WGE and the results indicated more contamination. PADEP initiated a Prompt Interim Response (PIR) plan to provide bottled water and Point of Entrance Treatment systems as a temporary solution to providing potable water to those above the EPA HA of 70 ppt. To this writing there have been no POETs installations provided for those above the EPA HA. Several residents have had POETs installed at their own expense.

To date there are thirteen residence wells above the EPA HA and I would estimate approximately 80% of the results will be above the PADEP proposed enforceable MCL of PFOS at 18 ppt. That PADEP PFAS MCL Rule (#7-569) Comment Period Ended 04/27/2022 and is awaiting a decision.

On June 15, 2022 the EPA Issued New Drinking Water Health Advisory Levels for PFOA, PFOS, PFBS, and GenX. The HAL for all these contaminants is below the PADEP propose MCL Rule (#7-569) enforceable limits. Even public water supplies are susceptible to PFAS contamination at those MCL's.

## **SUGGESTED COURSE OF ACTION**

1. The discovery of PFAS in the Benner Township GTAC7 report was documented in August of 2019 and some wells north of RW6/24 were tested again in March of 2021. It is nearly September of 2022, three years since PFAS discovery and the residents of Walnut Grove Estates are still awaiting test results. Finish post haste with the testing, provide the agreed prompt interim response for those affected and consider providing the PIR for everyone. PFAS is everlasting at any MCL, as the contamination is through no fault of our own.
2. Find the responsible parties for the contamination. There are more than health issues at risk with each homeowner: property valuation loss, personal expenses and remediation of septic systems are to name a few. Public water is the stated goal of PADEP. This is a long-term solution in the three-to-five-year range.
3. Soils testing must be done for Detention Pond Dam 1A. Other stormwater routes that tribute to Spring Creek like the Big Hollow Stormwater Basin must be tested.
4. PADEP approved a Benner Township Updated 537 Plan to allow SBWJA to install a sewer extension in the Big Hollow Stormwater Basin. One cannot allow the “forever chemicals” like PFAS to infiltrate the high-quality cold-water fishery of Spring Creek and points downstream into the Chesapeake Bay Watershed.
5. Find the source or pathway of EDB and match the PFAS route to WGE. (Commenter #1)

RESPONSE #34:

*First a point of clarification, on June 15, 2022 EPA issued HALs for PFBS and GenX, these standards are immediately incorporated into the Act 2 standards. For PFOA and PFOS, the standards published were interim HALs. DEP is evaluating how these interim HALs would impact cleanups in Pennsylvania.*

- 1) *DEP agrees that the investigation, mitigation and remediation of the PFAS contamination should continue as expeditiously as possible and is committed to doing so.*
- 2) *As covered in Response #7, DEP is currently investigating to determine source(s) of the contamination and recognizes the wide-ranging impacts that the contamination may have had on the community, but our actions can only be focused on the direct soil and groundwater impacts. DEP is committed to identifying a permanent solution to the impacted water supplies be it municipal water, or permanent treatment with the POET systems.*
- 3) *DEP has long said that sampling of detention basin 1A would be conducted once we were able to conduct a thorough home well sampling investigation. The soil sampling of Detention Basin 1A, along with Pond 4A and multiple drainage areas located on UPA property, was done in August of 2022, we are waiting to receive the results from the laboratory.*
- 4) *The sewer line is not part of the proposed interim action and therefore not addressed in this comment response document.*
- 5) *Investigation of EDB was not part of the proposed interim response and therefore this comment is not addressed in this comment response document.*