



February 11, 2025

Sent via First Class U.S. Mail and Electronic Mail

Pennsylvania Department of Environmental Protection
Hazardous Sites Cleanup Program
208 W. Third Street, Suite 101
Williamsport, PA 17701
RA-EPNCECComments@pa.gov

Re: Public Comment on Proposed Consent Order and Agreement regarding the Benner Township PFAS Investigation Site, Centre County

To Whom it May Concern,

ClearWater Conservancy is an Accredited Land Trust that has been working in the Centre Region since 1980. Our mission is to "conserve and restore our natural resources through land conservation, water resources stewardship, and environmental outreach across Pennsylvania." In 2022, ClearWater acquired a farmhouse and several acres along Spring Creek at 1601 Houserville Road, also referred to as parcel nos. 19-004-111-0001P and 19-004-111-0002P in College Township, Centre County (the "Property"). ClearWater is renovating the Property and creating a Community Conservation Center on site.

We are commenting on the proposed COA because it is our understanding that the Department of Environmental Protection's Area of Investigation stops less than 1 mile northwest of the Property. During due diligence for our Community Conservation Center, we tested the farmhouse well for PFAS in November 2024 and the sample exceeded the drinking water standard of 4.0 ppt for perfluorooctanesulfonic acid (a PFOS compound) at 5.2 ppt. A second sample was taken January 9, 2025 and PFOS was not found in that sample.

Given the high PFOS concentration at the edge of the area of investigation, the expanding nature of plumes, the karst conditions in the aquifer, and the uncertainty that Big Hollow Run will capture all the PFOS from the airport, we urge the Department to expand their area of investigation and extend the timeframe to ensure all potentially affected water supplies are accounted for and any necessary remediation is implemented.

Sincerely,

Elizabeth Crisfield, PhD
Executive Director

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