

Comments to the Consent Order and Agreement between PADEP and Pennsylvania State University published in the PA Bulletin, Volume 55, No 2, December 7, 2024

I am David Thomas Roberts a Benner Township resident at 1995 Valley View Road Valley View Road, Bellefonte, PA 16823

The COA is lacking in many ways to properly protect our water resources and the health and safety of Benner's residents.

I call attention to specific deficiencies in the consent agreement as follow:

1. Response Costs
Section JJ, page 10 and Exhibit E. Response costs incurred by Pennsylvania tax payers is given as \$892,487.16. However the consent agreement Item 6. page 18 only requires Penn State to reimburse the Commonwealth \$564,767.29

The consent agreement lacks any clear reason for this discrepancy of \$327,719.87.

- 2, The Department Investigation Area as defined in Findings section I. page 13 is too limited and does not encompass the full extent of the spreading plume of PFAS impacting lands, wells, and water resources.

A well serving the Bellefonte Trout Fish Hatchery and a new well near Houserville recently tested by DEP and have been found to contain PFAS. Both of these wells are outside of the investigation area defined in the consent agreement.

3. "Remedial Response" and "Final Remedy" are important terms that are not clearly defined in the consent agreement.

Clear definition is needed for these terms since these terms are being used as potential determining factors for required remedial actions in the consent agreement.

4. Remedial Actions
Point of entry treatment (POET) systems installed to remove PFAS from contaminated residential water supply wells are currently described as a "Remedial Response" by DEP.

However these "POET" systems are proposed as a potential "Final Remedy" in section h. ii. page 16 and in Section j. ii. page 17.

The consent agreement further stipulates that if POET systems are approved as a "Final Remedy" then Walnut Grove homeowners will assume the costs and responsibilities from Penn State for the perpetual maintenance of these POET filtration systems.

POET filtration systems are complicated, expensive, difficult to maintain, and need professional monitoring including costly and regular effluent analysis for toxic PFAS. Spent POET filtration canisters saturated with PFAS are toxic waste that must be disposed of by a certified hazardous waste disposal service.

Penn State must not be relieved of the responsibility to install, maintain, and monitor POET systems if these systems are approved by DEP as a "Final Remedy".

5. Emphasis must be placed on the installation of a public potable water supply to the residences and businesses impacted by PFAS contamination in their water supply wells.

The “Benner Township Walnut Grove Estates Development Water Line Feasibility Study” of May 2023 concluded that the State College Borough Water Authority is the most capable water authority to install a potable water system for Walnut Grove. SCBWA ranked number one in all areas including constructibility and cost; operations and maintenance; water quality and reliability; property, utility, and easement impacts; and environmental and permitting criteria.

Unfortunately SCBWA has declined to install a potable water line to Walnut Grove Estates due to their estimation of operation and maintenance costs.

The operation and maintenance cost of a potable water line should be part of Penn State’s response in the consent agreement as it is neither the actions of Walnut Grove residents or the SCBWA that has resulted in the toxic PFAS contamination of Benner Township’s drinking water aquifers.

Thank you for the opportunity to comment on this COA.