



1201 West Branch Road
State College, PA 16801-7697

www.scbwa.org

Telephone: 814-238-6766
FAX: 814-238-2175

To: Pennsylvania Department of Environmental Protection
Hazardous Site Cleanup Program

From: Brian C. Heiser, Executive Director

Re: Consent Order and Agreement, Benner Township PFAS Investigation

Date: January 17, 2025

The State College Borough Water Authority (Authority) presents the following comments on the Consent Order and Agreement between the Pennsylvania State University (PSU) and the Pennsylvania Department of Environmental Protection (PA DEP). The Authority requests that DEP considers incorporating these comments into the final Consent Order and Agreement.

1. As part of the ongoing investigation, the Authority requests that PA DEP expand the investigation area to include the groundwater monitoring wells at Penn State's Living Filter wastewater disposal operation and their associated recharge areas. A recent published study (Mroczko et al., 2022, *Spatiotemporal patterns of PFAS in water and crop tissue at a beneficial wastewater reuse site in central Pennsylvania*, Journal of Environmental Studies) indicates that multiple PFAS compounds have been detected in multiple Living Filter groundwater monitoring wells above drinking water maximum contaminant levels (MCLs), including PFOA (1.1 to 30 ng/L), PFOS (non-detect to 22 ng/L), and PFHxS (non-detect to 12 ng/L). The Living Filter is approximately one mile upgradient from the Authority's Wellfield 6 and falls within its Zone II Wellhead Protection Area and the delineated capture zone. This facility is a crucial component of the Public Water Supply system for the Centre Region.
2. Should PA DEP's expanded investigation confirm contaminant levels exceeding the state drinking water standards for PFOA, PFOS, PFBS, PFNA, or PFHxS then a feasibility study should be conducted to identify an alternative means for treated wastewater disposal or additional treatment methods to remove the compounds from the treated wastewater effluent prior to disposal at the Living Filter.
3. Should the Authority's Wellfield 6 become contaminated now or in the future the Authority requests that funds be made available pursuant to Section 3.k of the November 13, 2024 Consent Order and Agreement between PA DEP and Penn State to construct the necessary treatment facilities ensuring the continued safe use of the wellfield as a public water supply.

4. Due to the potential impacts on our Wellfield 6, the Authority requests an opportunity to provide comment on all related work plans and reports, including but not limited to the following investigation phases:
 - a. Site characterization
 - b. Remedial investigation
 - c. Risk assessment
 - d. Remediation plan
 - e. Remediation implementation and monitoring
 - f. Final investigation report
 - g. Any additional plans and/or reports that may be necessary to implement interim or final remedies
5. If there are additional impacted properties identified within the Authority's service area, the study should evaluate funding options for potential extension of public water service as an alternative to installing permanent POETs.
6. The Authority requests that if other potentially responsible parties are found liable for PFAS contamination that may impact the Authority's facilities, such as Wellfield 6, that those parties shall also be environmentally and financially liable to the Authority where legally appropriate.