

Commonly Asked Question – Benner Township PFAS Investigation Questions on the MCLs

1. What are the MCLGs and MCLs approved by the Environmental Quality Board on October 12, 2022 and what are the remaining steps before these standards can be promulgated?

The MCLG, the lower number, is a goal and the higher number (MCL) is the proposed standard. An MCLG is a non-enforceable standard based on health effects and does not take into consideration other factors such as technical limitations or cost. The Safe Drinking Water rulemaking package now moves to PA's Independent Regulatory Review Commission. The anticipated timing for publication of the final MCLs is early 2023. Thirty days after publication the MCLs take effect.

2. In the description of qualifying entities to be affected by the proposed MCLs ruling, the “non-transient non-community water system, or NTNCWS, is listed. Does this designation include private wells?

*A private well is not regulated by DEP. The NTNCWS designation is a Water Supply Program regulated system identified as the following: **Non-Transient Non-Community Water System (NTNCWS):** A public water system that regularly supplies water to at least 25 of the same people at least six months per year. Some examples are schools, factories, office buildings, and hospitals which have their own water systems.*

3. When the proposed MCLs are promulgated, are the limits for PFOA and PFOS a combined standard or applied individually?

The proposed MCLs levels for individual contaminants. The proposed MCLs are 14 ppt for PFOA and 18 ppt for PFOS.

4. If the proposed MCLs do become regulation, what is the next step for homeowners whose wells tested below the 70 ppt but above the MCLs?

DEP has been conducting confirmation and follow-up testing to create a list of those residences that will qualify for alternate water sources following promulgation of the MCLs. We are also making as many preparations as we can in advance so that if the MCLs are promulgated we can respond promptly. The POET systems for these additional homes will be installed as soon as the contractor can get the home assessments and final installation scheduled.

Questions about POET systems and reimbursement

5. Will homeowners who installed POET systems on their own be reimbursed for these systems by DEP?

For those residents whose water supply had concentrations of the PFAS compounds PFOA and PFOS exceeding 70 ppt and installed a treatment system to remove the PFAS compounds, DEP is in the process of gathering documentation from property owners for the systems installed and initiating a package to be processed for reimbursement. An inspection of the treatment system may be required depending upon the system design and installation specifics. If the existing system contains the resin-based media and does not require upgrade, the homeowner will provide their receipts and DEP will evaluate reimbursement. If there are any systems with a different design that does not include the resin media, that system will be upgraded by DEP. DEP cannot reimburse for any system installed to treat issues other than PFAS.

6. What is the anticipated timeline for reimbursement if I Installed my own Poet system?

There is no set timeframe, however once all necessary documentation is received and the treatment systems evaluated, DEP will begin processing the reimbursement packages.

7. For homes with POET systems installed by DEP, who will conduct testing to determine when the filtration system must be swapped out?

As DEP has stated previously, testing to determine that the system is working effectively will be conducted by DEP; testing at regular intervals to determine if the filter media needs a change-out will be conducted by DEP until such time that a final response has been determined and finally DEP will cover any maintenance of the system, including change-out of media, until such time that a final response has been determined. If the POET systems are the final response, there will be a time after that decision is made that the maintenance will be turned over to the homeowners. DEP will furnish information on recommended testing and maintenance at that time. DEP will also extend the testing and maintenance to those homeowners who had POETs installed at their own expense following an inspection of the system to determine if any upgrades or other changes are required.

8. Is a carbon-based POET system capable of reducing PFAS levels to the proposed MCLs? What systems is DEP installing?

DEP is installing resin-based systems in the homes as it provides optimum removal of PFAS compounds. While other systems, for instance carbon-based,

may be capable of removing PFAS compounds, our contractor experts recommend resin-based systems, therefore that is the system we are installing.

9. EcoWater has stated that a sediment filter was not a part of the DEP contract. Why wasn't it included?

DEP's contractor and vendor are providing recommendations for the systems based on what is needed for the systems to be effective in each residence. We did not specify a sediment filter, but if their expert recommendation is that one is needed, then it would be included. In the specific case of sediment filters, these were not explicitly included in the contract as many homeowners may already have them installed as part of their current system. There are many particular items that were not spelled out in the contract that are being considered as part of the system design for any given residence.

10. Shouldn't everybody be provided water in this area until a more permanent source can be provided.

DEP can only take an action based on the established standards. As the standards change, we will continue to re-evaluate who receives POET systems.

11. What will the final remedy be?

DEP is evaluating both the provision of municipal drinking water and permanent use of the POET systems. Our contractor is evaluating the costs and long-term effectiveness of both options. In general, we prefer permanent solutions with no maintenance requirements for the homeowner.

Questions about sampling

12. Some Benner Township residents have considered arranging for testing through PACE of their home supply wells at their own expense. Does DEP plan to provide testing for homeowners?

DEP has been providing extensive sampling and resampling. DEP has resampled, or scheduled for resampling, everyone that has requested it. We have conducted any sampling needed to illustrate that homes with concentrations between the proposed MCLs and the current standard of 70 ppt will qualify for provision of the alternate water source if the proposed MCLs are promulgated. We are also sampling privately installed treatment systems to ensure they are working as designed. For those homes below the proposed MCLs, DEP is and will continue sampling these homes in an effort to account for any variation in concentrations that may occur. We do not believe any additional

sampling by the homeowners is needed, however it is up to the homeowner if they want to pay for additional sampling.

13. How has the resampling been prioritized?

DEP resampled homes that were near or above the current standard. We also have already conducted any sampling needed to illustrate that homes with concentrations between the proposed MCLs and the current standard of 70 ppt will qualify for provision of the alternate water source. For those homes below the proposed MCLs, DEP is and will continue sampling in an effort to account for any variation in concentrations that may occur. We have also resampled home wells where there may be a questionable result. Following that we are resampling those homeowners who have reached out, outside of Walnut Grove Estates, to request sampling.

14. Have the surface soil samples collected on airport property been received by DEP? What were the results?

These results were received on 10/19/22. All samples collected were below the soil standards for PFOA, PFOS and PFBS.

Other questions

15. What is the process for identifying a responsible party? While we understand that sampling/analysis cannot be rushed, we would like to understand what evidence is needed to make this determination.

While sampling is part of the process of identifying a responsible party, the determination also includes historic records review and discussions on a technical as well as legal level. Specifics on the type of evidence collected and reviewed varies based by situation and the history of a given site or entity. As with any investigation these issues take some time to resolve.

16. What is the timeline for results of identifying the responsible party or parties?

There is no established timeline. DEP continues with our investigation by taking the steps needed to identify responsible parties.

17. Some states have warned hunters about potential contaminated meat from deer harvested in PFAS contaminated areas. What is the PA Department of Health and the PA Game Commission doing to address this?

Any warnings for this activity are up to the Department of Health and the Game Commission, questions on this should be directed to them.