RESPONSE JUSTIFICATION DOCUMENT
RIDGE RUN PFAS HSCA SITE
EAST ROCKHILL TOWNSHIP, WEST ROCKHILL TOWNSHIP, PERKASIE
BOROUGH
BUCKS COUNTY
REGION I

DEP APPROVAL

Based on the facts and findings outlined in this Response Justification Document, further investigation or response action is deemed appropriate, pursuant to Section 501(a) of the Hazardous Sites Cleanup Act.

Ragesh Patel, Manager

Hazardous Sites Cleanup Program

Southeast Regional Office

10-21.2016

Date

Sachin Shankar, Assistant Regional Director

Southeast Regional Office

0 21/16 Date

SUMMARY OF FACTS:

The Ridge Run PFASs HSCA Site (Site) is an approximately three square mile area that may have Per- and poly-fluorinated alkyl substances (PFASs) groundwater contamination surrounding the public water supply well NP-74. NP-74 was operated by the North Penn Water Authority and was found to have PFASs exceeding the lifetime Health Advisory Level (HAL) combined concentration for Perfluorooctane sulfonate and (PFOS) Perfluorooctanoic acid of 70 nanograms per liter (ng/L).

On August 8, 2016, the North Penn Water Authority (NPWA) conducted voluntary sampling for PFASs in two public water supply wells in East Rockhill Township: NP-73, and NP-74. The analysis of those samples detected 110 ng/L of PFOS and 7.1 ng/L of PFOA in NP-74, above the HAL. PFOS was detected at 57 ng/L and PFOA was detected at 8 ng/L in NP-73. NPWA shut down NP-74 upon receipt of the results on September 12, 2016. NPWA resampled the two supply wells on September 19, 2016. PFOS was detected at 110 ng/L and PFOA at 6.7 ng/L in NP-74. PFOS was detected at 62 ng/L and PFOA was detected at 7.7 ng/L in NP-73.

The Site is conceptualized as a one mile in radius circle centered on NP-74. It is loosely bounded by East Rockhill Road, North Rockhill Road, Bethlehem Pike, and North Ridge Road, and encompasses portions of East Rockhill Township, West Rockhill Township, and Perkasie Borough. The Site is a mix of residential, park, and commercial properties, and includes the Pennridge Airport at the Southernmost portion of the Site, and State Game Lands Number 139 in the Northeast portion of the Site. Three Mile Run flows east through the Site towards Lake Nockamixon. Bog Run flows east through the Site towards Tohickon Creek According to the 2010 Census, 3,764 people live within the Site boundaries.

PFASs are a broad class of man-made compounds used in Aqueous film forming foams, the manufacture of carpets, non-stick cookware, waterproof clothing, electronics, and consumer stain removers. In animals, high concentrations of PFASs have caused cancers and can have developmental and reproductive effects. Human epidemiological data is limited, and suggests exposure to PFASs can cause increased blood serum total cholesterol levels and low birth weights.

RESPONSIBLE PERSONS:

No persons as defined by Section 103 of HSCA, have been identified at this time as being responsible persons pursuant to Section 701 of HSCA.

FINDINGS AND AUTHORITY TO ACT:

Section 501(a) of the Hazardous Sites Cleanup Act grants DEP the authority to undertake investigations and response actions when there has been a release of a contaminant which presents a substantial danger to the public health or safety or the environment.

DEP considers PFASs to be contaminants as defined in Section 103 of HSCA:

Contaminant: An element, substance, compound, or mixture which is defined as a pollutant or contaminant pursuant to the Federal Superfund Act.

The Federal Superfund Act (CERCLA) defines a pollutant in 42 U.S. Code § 9601 as:

The term "pollutant or contaminant" shall include, but not be limited to, any element, substance, compound, or mixture, including disease-causing agents, which after release into the environment and upon exposure, ingestion, inhalation, or assimilation into any organism, either directly from the environment or indirectly by ingestion through food chains, will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction) or physical deformations, in such organisms or their offspring; except that the term "pollutant or contaminant" shall not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under subparagraphs (A) through (F) of paragraph (14) and shall not include natural gas, liquefied natural gas, or synthetic gas of pipeline quality (or mixtures of natural gas and such synthetic gas).

DEP has adopted the lifetime HAL as the Medium-Specific Concentration for PFOS and PFOA in groundwater pursuant to 25 Pa 250.304(c) which states:

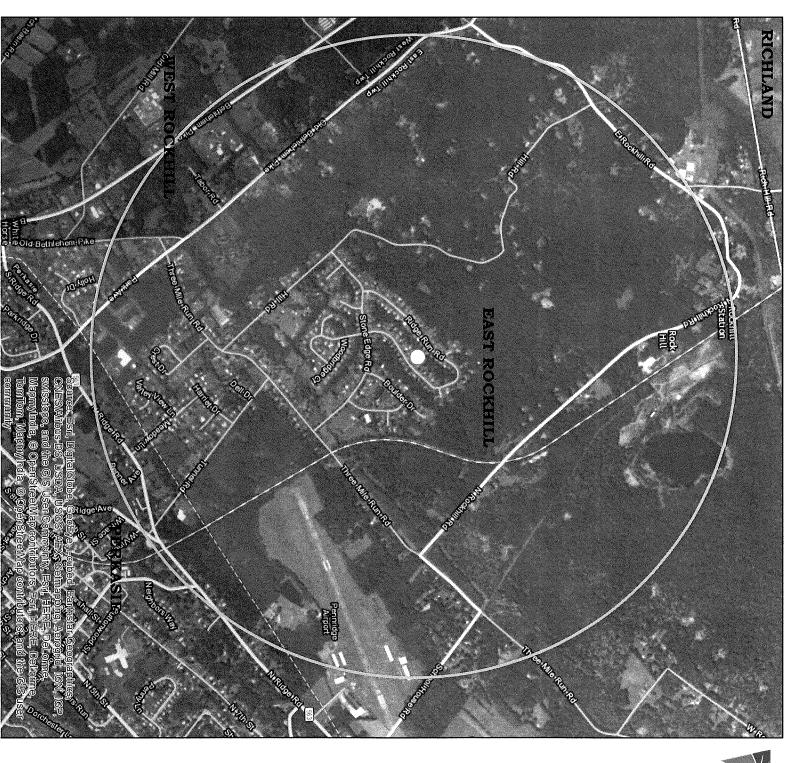
The MSCs for regulated substances contained in groundwater in aquifers used or currently planned to be used for drinking water or for agricultural purposes is the MCL as established by the Department or the EPA as established in § 109.202 (relating to state MCLs, MRDLs and treatment technique requirements) and Health Advisory Levels (HALs) set forth in Drinking Water Standards and Health Advisories, EPA Office of Water Publication No. EPA 822-R-09-011 (October, 2009). For a regulated substance where no MCL has been established, the MSC is the lifetime HAL for that compound.

REFERENCES:

The Hazardous Sites Cleanup Act 108 (35 P.S. §6020.101)

Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. §9601)

Attachment 1: Site Map





Ridge Run PFAS HSCA Site

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1 MILE Radius

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