

COMMONWEALTH OF PENNSYLVANIA

Department of Environmental Protection
Hazardous Sites Cleanup Program

Ridge Run PFAS HSCA Site
East and West Rockhill Townships, Bucks County

STATEMENT OF DECISION

The Commonwealth of Pennsylvania, Department of Environmental Protection (Department) files this statement of the basis and purpose for its decision in accordance with Section 506(e) of the Pennsylvania Hazardous Sites Cleanup Act, Act of October 18, 1988, P.L. 756, No. 108 (HSCA), 35 P.S. Section 6020.506(e).

The Department has selected the proposed Interim Response Alternative 3, Installation and Maintenance of Whole-House Filtration Systems (systems) with Restrictions on the Use of Groundwater, which is outlined in the Analysis of Alternatives and Proposed Response document to address the threats posed by exposure to per- and poly-fluorinated alkyl substance (PFAS) contamination above the United States Environmental Protection Agency's (EPA) published lifetime Health Advisory Limit (HAL) in residential privately-owned potable wells within the Ridge Run PFAS HSCA Site (the Site), located in East and West Rockhill Townships, Bucks County.

I. SITE INFORMATION

A. Site Location and Description

The Ridge Run PFAS HSCA Site (Site) is located along portions of Old Bethlehem Pike, Bethlehem Pike, Tabor Road, Hill Road and North Rockhill Road in East and West Rockhill Townships, Bucks County. The Site consists primarily of residential properties, with various recreational and several commercial and industrial properties. Recreational properties include community parks, a Veterans of Foreign Wars hall, and a state game land. Commercial properties include auto repair facilities, restaurants, a salon, a landscape products business, and a plant nursery. Also, within the Site are a church and school. Industrial properties include a quarry and an auto salvage yard.

B. Site History

In August 2016, the North Penn Water Authority conducted sampling for six types of PFAS in two public water supply wells in East Rockhill Township in accordance with the federal Unregulated Contaminant Monitoring Rule 3¹. Analysis of these samples detected combined concentrations of Perfluorooctane sulfonate (PFOS) and Perfluorooctanoic acid (PFOA) of 117

¹ Available at <https://www.epa.gov/sites/production/files/2017-02/documents/ucmr3-data-summary-january-2017.pdf>.

parts per trillion (ppt) and 70 ppt in these wells, both at or above the EPA HAL of 70 ppt for PFOS and PFOA.

After North Penn Water Authority's sampling activities, the Department sampled approximately 167 properties in its subsequent investigation of privately owned wells in the surrounding area. Of the 167 properties that the Department sampled, twelve (12) residential properties and one (1) commercial property have demonstrated sampling results with concentration levels above the HAL. The highest combined concentration of PFOS and PFOA detected was 16,360 ppt. No source area has yet been identified. The Department continues to sample properties affected by PFOS and PFOA contamination to monitor concentration levels at the Site. The Department has also been providing bottled water to the residential properties impacted above the HAL.

C. Release of Hazardous Substances and Contaminants

The compounds identified above are considered "contaminants" as that term is defined by Section 103 of HSCA, 35 P.S. § 6021.103, and Section 9601 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S. Code § 9601. Exposure to concentrations of PFOS and PFOA above the HAL pose a threat to human health when ingested in water.

Health effects associated with long-term exposure to these chemicals may include developmental delays, decreased function of the liver, damage to the immune system and increased risk of certain cancers.

PFAS are not found naturally in the environment. Of the PFAS chemicals, PFOA and PFOS have been the most extensively produced and studied. They have been used to make cookware, carpets, clothing, fabrics for furniture, paper packaging for food, and other materials that are resistant to water, grease, or stains. They are also used in firefighting foams and in a number of industrial processes.

II. RESPONSE CATEGORY

The selected response is an Interim Response, which is defined in Section 103 of HSCA, 35 P.S. § 6020.103, as a response which does not exceed 12 months in duration or \$2,000,000 in cost, except under certain circumstances.

III. CLEANUP STANDARDS

The selected response is not a final remedial response pursuant to Section 504 of HSCA, 35 P.S. § 6020.504.

Additional response actions may be needed to achieve a complete and final cleanup for the Site.

IV. APPLICABLE, RELEVANT and APPROPRIATE REQUIREMENTS (ARARs)

The following standards, requirements, criteria or limitations are legally applicable, or relevant and appropriate under the circumstances presented by the Site.

A. ARARs

Hazardous Sites Cleanup Act, Act of October 18, 1988, P.L. 756, No. 108, *as amended*, 35 P.S. §§ 6020.101 *et seq.*

- Gives the Department the authority to perform investigations, initiate cleanups, and provide replacements for contaminated water supplies.
- Establishes a fund to cover the costs of such activities.
- Provides administrative procedures for conducting response actions.
- Defines a “contaminant” and “hazardous substance” as any substance defined as such by CERCLA.

Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S. Code §§ 9601 *et seq.*

- Defines a “contaminant” as any element, substance, compound, or mixture, which when released to the environment and upon ingestion, may reasonably be anticipated to cause disease; cancer and other harm to humans and other organisms.

Land Recycling and Environmental Remediation Standards Act, Act of May 19, 1995, P.L. 4, 35 P.S. §§ 6026.101 *et seq.*, and the regulations promulgated thereunder at 25 Pa. Code Chapter 250.

- Provides that, for regulated substances where no Maximum Contaminant Level (MCL) has been established by the Department or the EPA, the Medium-Specific Concentrations for groundwater are the Lifetime HAL.
- Provides remedial standards to be considered as applicable, relevant and appropriate requirements under CERCLA and HSCA.

Pennsylvania Safe Drinking Water Act, Act of May 1, 1984, P.L. 206, No. 43, *as amended*, 35 P.S. §§ 721.1 *et seq.*, and the regulations promulgated thereunder at 25 Pa. Code Chapter 109.

- Establishes a state program to oversee the provision of safe drinking water to the public.
- Sets forth drinking water quality standards and provides requirements for public water systems, including permit design, construction, source quality, and siting requirements.

Uniform Environmental Covenants Act, Act of December 18, 2007, P.L. 450, No. 68, 27 Pa. C.S. §§ 6501 *et seq.* (“UECA”), and the regulations promulgated thereunder at 25 Pa. Code Chapter 253.

- Provides a standardized process for creating, documenting and assuring the enforceability of activity and use limitations on contaminated sites.

- Requires an environmental covenant whenever an engineering or institutional control is used to demonstrate the attainment of an Act 2 remediation standard for any cleanup conducted under an applicable Pennsylvania environmental law.

B. TO BE CONSIDERED.

In addition to the ARARS listed above, the following documents are relevant to the response actions proposed herein, though they do not create any statutory or regulatory obligations.

Standard Operating Procedure for the Hazardous Sites Cleanup Program, HSCA Handbook, Division of Site Remediation, Bureau of Environmental Cleanup and Brownfields, January 2013.

Guidance for Commonwealth-Funded Water Supply Response Actions, November 21, 2015, Department of Environmental Protection, Bureau of Environmental Cleanup and Brownfields, document number 262-5800-001.

- Outlines implementation of Commonwealth-funded water supply responses, including procedures for providing temporary or permanent response actions for impacted private water supplies.
- Details specific work related to response actions that may be financed via the HSCA fund.
- Explains operation and maintenance duties of response actions, including the appropriate parties that should conduct such activities.
- Describes the use of institutional controls as part of the response action process.

V. ANALYSIS OF ALTERNATIVES

ALTERNATIVE 1: No Action

Description of the Alternative:

The no further action alternative serves as a baseline to compare against other proposed response action options. Under this alternative the Department would take no further action and would not continue providing bottled water to affected residents.

Protection of Human Health and Environment:

This alternative would not eliminate the ingestion exposure pathway for PFOS and PFOA above the HAL.

Compliance with ARARs:

This alternative would not comply with ARARs. The public would be exposed to concentrations of PFOS and PFOA in the groundwater and drinking water above the HAL established by the EPA.

Feasibility, Effectiveness, Implementability and Permanence:

This alternative would be feasible and implementable because no action is being taken but would not be effective in addressing the health threats to the public.

Cost Effectiveness:

There is no cost associated with this alternative.

Alternative 2. Continued Delivery of Bottled Water (for a 12-month period) with Restrictions on the Use of Groundwater

Description of Alternative:

Under this alternative, the Department would continue to supply bottled water to the residential properties in the Site that have untreated privately owned potable wells with concentrations of PFOS and PFOA above the HAL. The commercial property would not be included in this alternative. Bottled water would be supplied for a 12-month period. The Department would sample the wells over this period to determine if PFOS and PFOA remain above the HAL. After 12 months, residents would be responsible for securing their own potable water. The Department would sample the residential properties for a year after the completion of this alternative as part of its investigation of the Site.

Pursuant to Section 512 of HSCA, 35 P.S. § 6020.512, and Section 6517(a)(2) of UECA, 27 Pa.C.S. § 6517(a)(2), the Department would ensure that future property owners are aware of the contamination and that future exposure to PFOS and PFOA at any property is eliminated by requiring that a limitation on groundwater usage be included in an environmental covenant recorded at the local recorder of deeds.

Protection of Human Health and Environment:

This alternative would effectively eliminate the ingestion exposure pathway for PFOS and PFOA above the HAL.

Compliance with ARARs:

This alternative would comply with ARARs as the bottled water that the Department uses to supply affected residential properties does not have PFOS and PFOA above the HAL. The Department sampled the bottled water that is being supplied to verify that it does not have PFOS and PFOA above the HAL.

Feasibility, Effectiveness, Implementability and Permanence:

This alternative is not considered a permanent solution because it would not allow the existing residential privately owned potable wells at the Site to be used as potable wells for an

undetermined amount of time. Additionally, this alternative may be difficult to implement in times of inclement weather.

Cost Effectiveness:

The estimated cost of continuing to provide bottled water to affected residential properties above the HAL for 12 months is approximately \$6,500.

Alternative 3. Installation and Maintenance of Whole-House Filtration Systems with Restrictions on the Use of Groundwater

Description of Alternative:

Under this alternative, the Department would install and maintain Whole-House Filtration Systems in the form of point of entry treatment (POET) systems. These systems would be placed in homes in the Site that have untreated privately owned potable wells with concentrations of PFOS and PFOA above the HAL. The Department would sample the systems over an initial 12-month period to determine if the filters are operating properly. The Department would continue to provide bottled water during this period until the systems have demonstrated that they are reducing PFOS and PFOA concentrations to below the HAL. After that 12-month period, the responsibility for maintaining the systems would be turned over to homeowners. The commercial property would not be included in this alternative.

Pursuant to Section 512 of HSCA, 35 P.S. § 6020.512, and Section 6517(a)(2) of UECA, 27 Pa.C.S. § 6517(a)(2), the Department would ensure that future property owners are aware of the contamination and that future exposure to PFOS and PFOA at any property is eliminated by requiring that a limitation on groundwater usage be included in an environmental covenant recorded at the local recorder of deeds.

Protection of Human Health and the Environment:

This alternative would effectively eliminate the exposure pathways and, as a result, eliminate exposure to concentrations of PFOS and PFOA in the groundwater above the HAL. This alternative would also have the benefit of potentially providing control of local groundwater flow direction and preventing further spread of the PFOS and PFOA in groundwater at the Site via the continued pumping of existing wells.

Compliance with ARARs:

This alternative would comply with ARARs because the systems would reduce PFOS and PFOA concentrations to below the HAL.

Feasibility, Effectiveness, Implementability and Permanence:

This alternative is considered permanent provided that the systems are properly maintained and monitored. This alternative does require ongoing monitoring and maintenance costs for the property owners in order to ensure the systems are effective in eliminating exposure to

concentrations of PFOS and PFOA in groundwater above the HAL. This alternative also allows for the Department to quickly and efficiently expand and implement it for a relatively low cost should additional properties be identified in the future as affected by PFOS and PFOA contamination as the investigation continues. Relative to Alternative 4, this alternative can be more quickly implemented.

Cost Effectiveness:

The costs associated with this alternative include installation, sampling and maintenance of systems at 12 impacted residential properties over a 12-month period. The Department will continue to provide bottled water until the systems demonstrate they are reducing PFOS and PFOA to below the HAL

The systems will require periodic maintenance for the systems to continuously and effectively treat the water. Maintenance or issues related to the systems may arise in the initial 12-month period following installation, which the Department would cover.

Overall, the total cost for Alternative 3 is estimated at \$102,860, making it a cost-effective alternative.

Alternative 4. Extension of an Existing Public Water Line, with Restrictions on the Use of Groundwater

Description of Alternative:

Under this alternative, the Department would fund the connection of affected and threatened residential properties to an existing water line in the Site area. The Department would fund: 1) any necessary construction of an extension of existing water line mains, 2) the lateral connections from the main to the affected properties, 3) the connection of the laterals to the existing buildings' plumbing, 4) the repairs to all road surfaces or properties disturbed by the water line construction, and 5) the abandonment of residential privately owned potable wells. Groundwater usage would be restricted by a municipal ordinance to ensure residents cannot be exposed to PFOS and PFOA above the HAL. Such an ordinance would require all residential properties with privately owned potable wells with concentrations of PFOS and PFOA above the HAL to abandon those wells and connect to public water. The commercial property would not be included in this alternative.

Protection of Human Health and the Environment:

This alternative would effectively eliminate the exposure pathways for PFOS and PFOA above the HAL.

Compliance with ARARs:

This alternative would comply with ARARs. It would eliminate the exposure to PFOS and PFOA above the HAL in the groundwater. The utility providing the public water would be required to provide their customers with potable water below the HAL for PFOS and PFOA.

Feasibility, Effectiveness, Implementability and Permanence:

This alternative is effective at eliminating exposure to PFOS and PFOA among the currently identified affected properties and would be permanent in nature. This alternative is not as quickly implemented as Alternative 3, because it would involve a long period of construction. In addition, the Department's investigation is ongoing and as it progresses, the Department may identify additional properties where exposure must be addressed. Given the current uncertainties in groundwater conditions and the complex area geology of the Site, this alternative is less feasible than Alternative 3, because the line cannot be extended quickly or efficiently to address new exposures, if discovered. Finally, this alternative requires that included residential properties abandon their groundwater wells, the process of which could affect groundwater flow and result in the further spread of PFOS and PFOA.

Cost Effectiveness:

The estimated cost for Alternative 4 is over \$2,000,000. The Department does not consider this a cost-effective alternative since the groundwater conditions at the Site may continue to change and additional properties may be affected in the future. This alternative is cost-prohibitive because the entirety of the Site would need to be connected to the waterline to guarantee that no additional properties will be exposed to the groundwater with concentrations of PFOS and PFOA above the HAL.

VI. SELECTED RESPONSE

The Department has determined, based upon the information contained in this document and the Administrative Record, that an Interim Response action is justified at the Site in accordance with Section 505(b) of HSCA, 35 P.S. § 6020.505(b).

The Department has selected Alternative 3, installation and maintenance of whole-house filtration systems with restrictions on the use of groundwater (Selected Response), as an Interim Response at the Ridge Run PFAS HSCA Site. The Selected Response is effective in mitigating threats to public health and is cost effective.

The Selected Response, Alternative 3, affords substantially more protection to human health than Alternatives 1 and 2, and is as protective as Alternative 4 because it eliminates exposure to the contaminants in groundwater. The Selected Response abates the threat to human health from ingestion of water containing PFOS and PFOA above the HAL while allowing for the continued investigation of the Site.

The Department received comments from several residents, the Perkasio Regional Water Authority, and East Rockhill and West Rockhill Townships in support of Alternative 4. As discussed above, the widespread spatial area of the Site and remaining uncertainties regarding the long-term groundwater flow and number of properties affected makes the implementation of Alternative 4 neither feasible nor cost-effective at this time.

The Selected Alternative provides flexibility so that additional systems may be installed if subsequent sampling identifies properties where concentrations of PFOS and PFOA in residential privately owned potable wells exceed the HAL.

The Department will continue to monitor the concentrations of PFOS and PFOA at the residential properties where the systems are installed for at least one year after the completion of the Interim Response period as part of its ongoing investigation of the Site.

VII. MAJOR CHANGES FROM PROPOSED RESPONSE

In the Analysis of Alternatives, the systems were described specifically as carbon filtration systems. The Department received multiple comments during the public comment period questioning the efficacy and protectiveness of the systems to be installed under the Selected Response. To address these concerns, the Department will evaluate which filtration systems will be most effective at the Site and install those systems. In addition, to ensure protectiveness of the Selected Response, Alternative 3 was changed to include the provision of bottled water to the residential properties during the Interim Response period until sampling results demonstrate the systems are removing PFOS and PFOA below the HAL.

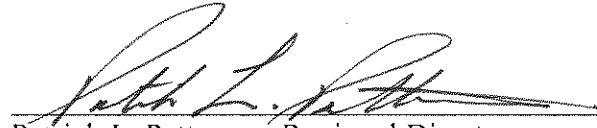
The Analysis of Alternatives indicated that the Department would perform operation and maintenance activities of the filtration systems installed as part of the response action for a duration of 12-months. The Department received multiple comments during the public comment period requesting that this duration be extended. In response to these comments, at the end of this 12-month period, the Department will evaluate whether any of the circumstances exist that would allow an interim response to exceed 12 months in duration under the HSCA definition of "interim response" and, if so, whether the 12-month period should be extended accordingly. At the end of the 12-month period, to evaluate the "interim response" the Department will utilize evaluation criteria that is consistent with the criteria established in the applicable rules and regulations, which includes effectiveness, community acceptance, cost effectiveness, human health protectiveness, and ease in implementation.

The Department has added UECA as an ARAR as a mechanism to ensure the protectiveness of the Selected Response through the use of environmental covenants to ensure maintenance of the systems, continued post-treatment well water sampling, and acknowledgment and prohibition on the use of groundwater on properties with concentrations of PFOS and PFOA above the HAL.

VIII. RESPONSE TO PUBLIC COMMENTS

The Department's response to public comments concerning the selection of this response action is filed in the administrative record.

FOR THE COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION



Patrick L. Patterson, Regional Director
Southeast Region Office

4-18-19

Date

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Hazardous Sites Cleanup Program

RESPONSE TO COMMENTS

Ridge Run PFAS HSCA Site

April 18, 2019

Notice of the establishment of an Administrative Record concerning the proposal of the Interim Response at the Ridge Run PFAS HSCA Site (Site) was published in the *Pennsylvania Bulletin* on June 2, 2018, and in the *Bucks County Courier Times* on June 3, 2018. The Administrative Record was available for public review at the East Rockhill Township Building, the West Rockhill Township Building, and the Pennsylvania Department of Environmental Protection Southeast Regional Office in Norristown. The Department accepted comments on the Administrative Record between June 2, 2018 and August 31, 2018 and conducted a public hearing on July 11, 2018, at the West Rockhill Township Building. During the hearing, the Department accepted oral comments on the Administrative Record. The Department has compiled all comments, both oral and written, received during the comment period. Oral comments have been excerpted from the public hearing transcript and a complete transcript of the oral comments is available for review at the Department's Southeast Regional Office in Norristown.

Oral Commenters:

- | | | |
|---------------------|-------------------|--------------------|
| 1.) Tracy Carluccio | 2.) Kelly Jameson | 3.) Angela Goodwin |
| 4.) Jim Pascale | 5.) Sandra Moyer | 6.) Gerald Moyer |
| 7.) Jennine Gravel | 8.) Dave Watt | 9.) Sue Furlong |

Written Commenters:

- | | | |
|-----------------------------|--|---------------------|
| 1.) Kelly & Jerry Jameson | 2.) Jodi Cutaia | 3.) Jessica Conrad |
| 4.) Angela Goodwin | 5.) Tracy Carluccio | 6.) Sheri D'Ginto |
| 7.) West Rockhill Township | 8.) Chris LaBelle | 9.) Andi Stephenson |
| 10.) East Rockhill Township | 11.) Emily Geib | 12.) Ryan Gottshall |
| 13.) Kimberly Gottshall | 14.) Perkasie Regional Water Authority | |
| 15.) Gerry Moyer | 16.) Peter McClennen | |

For each comment, the name of the commenter, and the Department's response are listed below:

Oral Commenter #1: Tracy Carluccio. Oral Comments transcribed on pages 27 - 31 of the hearing transcript.

Oral Comment 1-1:

"My name is Tracy Carluccio. I'm Deputy Director of Delaware River Keeper Network. First, we do not agree that applying the U. S. EPA health advisory level of 70 parts per trillion is reasonable and we think that using it actually can mask the amount of contamination that exists. I know we're not supposed to address this, but I think it is important to note that in June the ATSDR released minimum

risk levels that reduce the level at which no harm can be expected to approximately 7 parts per trillion for PEOS and 11 for PFOA. PFAS is highly toxic and linked to devastating disease such as cancer and developmental defects in children and infants, and even miniscule concentrations can have adverse health effects, particularly when you consider that it builds up in the blood and is not easily extruded by the body.

So we're also aware that many states are considering lower levels. New Jersey, for instance, is going to adopt mandatory maximum contaminant levels of 14 parts per trillion for PFOA and 13 parts per trillion for PFOS. And Delaware River Keeper Network, my organization, filed a formal petition with Pennsylvania's Environmental Quality Board last year asking that they set an MCL for PFOA of one part per trillion and no greater than six parts per trillion based on the most recent science.

The EQB did accept that petition and they're in the process of considering setting an MCL. We recently brought to the EQB's attention, by the way, that New Jersey did recommend this MCL for PFOS of 13 parts per trillion, and we submitted Delaware River Keeper Network's expert commissioned report that recommends 5 parts per trillion for PFOS. Based on the most recent science, the trigger for remediation and water replacement for people should either be a non—detect or no greater than 5 for PFOS or 1 to 6 PPT for PFOA. This substantially changes DEP's evaluation, and it affects the costs and how it's spread out and how many people it's spread out over, especially if PFAS is detected in more wells. Your summary of the groundwater sampling does show that there were detections in many more than 12 wells, and if the action level moves downwards, then more people will share will be affected either in bearing the cost of full house system maintenance after the installation period of one year or for the community to bring in water a water system. So we're very concerned that the action that's being proposed is not going to address the problem or be protective enough.”

Response to Oral Comment 1-1: The Department appreciates your comment. The purpose of the Interim Response is to provide an alternative source of drinking water for residential potable wells where concentrations of PFOS and PFOA combined or separately exceed the Lifetime Health Advisory Level (HAL) of 70 parts per trillion for PFOS and PFOA, separately, or combined.

Pennsylvania's Environmental Quality Board has not proposed a State Maximum Contaminant Level (MCL) before issuance of the Statement of Decision. If a State or Federal MCL is issued for PFOS or PFOA that is different from the HAL, DEP will reevaluate the Site, and will take action as necessary and appropriate.

Oral Comment 1-2:

“My organization supports alternative four, the piping in of public contaminant free water to provide the protection that is needed. Extending the public water system could be coupled with alternative three by the or by the use of bottled water until the pipe system is operating.”

Response to Oral Comment 1-2: At this time, uncertainties in groundwater conditions in the area and complex area geology make Alternative 4 less feasible than Alternative 3, as the waterline might have to be extended significantly over time. In addition, Alternative 4 is not as quickly implemented as Alternative 3, would involve a long period of construction, and could allow the further spread of PFOS and PFOA if existing residential privately-owned wells are abandoned, possibly changing groundwater flow. Moreover, the estimated cost for Alternative 4 is over \$2,000,000. The Department does not consider this a cost-effective alternative since the groundwater conditions at the Site may continue to change and additional properties may be affected in the future. Alternative 4 is cost-prohibitive because the entirety of the Site area would need to be connected to the waterline to

guarantee no additional properties will be exposed to the groundwater with concentrations of PFOS and PFOA above the HAL.

The Department has selected Alternative 3, the installation of Whole-house Filtration Systems with Restrictions on the Use of Groundwater as the Interim Response at the Site. The Selected Response includes sampling of the systems to ensure they are reducing PFOS and PFOA to below the HAL and the provision of bottled water to the residential properties where PFOS or PFOA concentrations exceed the HAL until the systems demonstrate their effectiveness.

Oral Comment 1-3:

“However, alternative three’s condition of turning the systems over to the homeowners after one year is unacceptable and unfair. Extending the public water system and using bottled water or whole house filters in the meantime or in those outlying wells will provide immediate long term relief for an already impacted community.”

Response to Oral Comment 1-3: Under the Hazardous Sites Cleanup Act (HSCA) definition of “interim response,” an Interim Response may not exceed twelve months in duration except in certain limited circumstances. The maintenance period is limited to twelve months to comply with this requirement. In response to these comments, at the end of this twelve-month period, the Department will evaluate whether any of the circumstances exist that would allow an interim response to exceed twelve months in duration under the HSCA definition of “interim response” and, if so, whether the twelve-month period should be extended accordingly.

In addition, for properties at the Site where PFOS or PFOA concentrations exceed the HAL, the Department has determined that an institutional control in the form of restrictions on the use of such groundwater is necessary to eliminate the long-term potential risk of exposure to groundwater contamination. Consequently, pursuant to the Uniform Environmental Covenant Act (UECA), the Department intends to use environmental covenants to effectuate such institutional controls. In addition, in order to provide the level of treatment necessary to reduce the levels of contaminants of concern to the HAL or below, the filtration systems require regular monitoring and maintenance. The Department intends to use environmental covenants to ensure that the affected property owners continue to monitor and maintain the filtration systems so that they continue to provide safe drinking water. The environmental covenants will also place future owners of the affected properties on notice of the applicable requirements.

Oral Comment 1-4:

Regardless of the solution, my organization feels it’s vitally important that the environmental cleanup of the pollution commences in tandem with the provision of clean drinking water to the community, and that the source be found and the solution on be coupled with finding that responsible party that could have the pockets that would pay for this, rather than the taxpayer or the homeowner.”

Response to Oral Comment 1-4: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department’s Response to Oral Comment 1-1 regarding the purpose of the Interim Response. Further response actions may be proposed as necessary to address other environmental media at the Site. No

Potentially Responsible Parties have been identified at this time. The Department's investigation of the Site is ongoing.

Oral Commenter #2: Kelly Jameson. Oral Comments transcribed on pages 31 - 33 of the hearing transcript:

Oral Comment 2-1:

"Hi. I'm Kelly Jameson. I live 6 Highpoint Circle, one of the wells, public wells, that were shuttered and switched to Perkasié. For 20 —plus years, citizens in our neighborhood have drinking this poisoned water. Within the past eight years, we've neighbors die from colon and breast cancers, young child taken by leukemia, classmates of my child suffering from Tourette's and our own child stricken with autoimmune disorders, inflammatory bowel disease and PANDA, which is Pediatric Autoimmune Neuropsychiatric Disorders Associated with streptococcal infection. The EPA has connected these diseases to PFOA and PFOS exposure. However, your response does not include PFOA, PFOS blood testing or monitoring for u. For 20 years, we drank this fouled water. It's irresponsible to tell us everything is okay now that you've closed the poison wells and switched our water supply. Like the people in Warrington who drank the PFC tank took water from the naval base, we need blood testing and annual health monitoring. We need to be ensured PF PFOS, P you know what I'm saying PFC s isn't hiding in our hot water tank sediment and continuing to poison us. So I request testing of our water tank sediment as previously requested in an unanswered e—mail to EPA. If found to be positive for P FOS, PFOA, the water tank should be replaced."

Response to Oral Comment 2-1: The Department appreciates your comment. This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-1 regarding the purpose of the Interim Response. The public supply wells that exceeded the HAL were shut down in 2016.

Oral Comment 2-2:

"Number two, PFOA, PFOS blood testing for those of who drank water supply water supplied by tainted wells."

Response to Oral Comment 2-2: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-1 regarding the purpose of the Interim Response. Health concerns regarding exposure to PFOS and PFOA may be directed to Anil Nair, PhD, Director, Division of Environmental Health Epidemiology, Pennsylvania Department of Health and/or your physician.

Oral Comment 2-3:

"Three, ongoing health monitoring for those victims found with elevated blood levels with PFOS, PFOA."

Response to Oral Comment 2-2: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-1 regarding the purpose of the Interim Response. Please see the Department's Response to Oral Comment 2-2 regarding to whom health concerns regarding exposure to PFOS and PFOA may be directed.

Oral Commenter #3: Angela Goodwin. Oral Comments transcribed on pages 33 – 36 of the hearing transcript.**Oral Comment 3-1:**

“Angela Goodwin, Tabor Road. Couple of things. I'm going what I'm speaking about is I'm taking care of myself and my family. You guys are taking care of yourself and your company. Right? As West Rock hill is taking care of themselves and Bergey's is taking care of themselves as well. Nobody's taking care of us. One of the things that you put up there was about the cost of the filters and what it's going to cost them. How about the cost of what we just lost in our home and the real estate value and our properties? What about the cost of, you know, our health and our family's health?”

Response to Oral Comment 3-1: The Department appreciates your comment. This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-1 regarding the purpose of the Interim Response. When taking an action under HSCA, the costs the Department can consider are limited to those associated with actions to assess, prevent, minimize, or mitigate damage to the public health. For the Selected Response, the costs are for the installation of the whole-house filtration systems, the initial monitoring and maintenance of those systems, and the provision of bottled water until the systems demonstrate their effectiveness.

Oral Comment 3-2:

“We've asked, like I said, for well water to be for soil samples to be done. That hasn't been done. Now, wells contaminated. The basin, retention basin, that's next to our house or behind our house doesn't drain down to the stream or didn't at that point in time. I have proof here. I got a hold of the conservation district after it filled for a year and a half and the 35 conservation district has been at our house. It used to drain on the property, the vacant lot next to us, which then ran down the road, our road, that we maintain and then down onto another the same neighbor's property across the street. It never made it down to that stream. You guys are testing streams and everything else or they tested streams where it never made it to. It wasn't until I had the retention basin fixed with the conservation district's help that it's been actually put out to where it's supposed to be.”

Response to Oral Comment 3-2: Please see the Department's Response to Oral Comment 1-1 regarding the purpose of the Interim Response. The Department's investigation of the Site is ongoing and includes the sampling of other environmental media.

Oral Comment 3-3:

“The other thing I wanted to mention was you keep on saying about having a you're putting in well systems to test. Now, how do we know that that them well systems that you're going to monitor aren't going to change the way the water flow goes? Or how about if that development goes in across from where we live? Does it change the way the water goes? Does it make everything worse?”

Response to Oral Comment 3-3: The Department's investigation of the Site is ongoing and will determine groundwater flow direction. The proper installation and construction of monitoring wells at the Site is not expected to affect the direction of groundwater at the Site.

Oral Comment 3-4:

The filters that go into our home, I have a higher level than, you know, somebody else down the street. That could cost me even more money than what somebody it might cost somebody else. The our filter could we could get it tested now and then a couple months later, you know, it's bad.

Response to Comment 3-4: Please see the Department's Response to Oral Comment 1-3 regarding sampling and maintenance of the systems.

Oral Comment 3-5:

"The other thing I wanted to know is how come Bergeyrs - a letter was sent to them in January or February, but yet they didn't respond. We sent another one in May. Have they ever responded? Have they ever complied? From what I can see from old newspaper articles, nobody's responded, nobody's cared about the residents that lived here, not Bergeyrs, not the township, nobody."

Response to Oral Comment 3-5: The Department received a response from Bergey's Realty Company to the Department's Request for Information in June 2018.

Oral Commenter #4: Jim Pascale. Oral Comments transcribed on pages 36 - 39 of the hearing transcript:**Oral Comment 4-1:**

"I think what when I look at the report and I see the concentration effort on just the red dots, in light of the comment that was made earlier regarding the changing of standards, I mean, they're changing rapidly. We're talking about 60 parts per million if that's the proper technology, it's ridiculous. So I think we need to take our head out of the sand and recognize that we need to have a solution that provides for a more realistic standard, which I'm hearing now is 7,11. And that will take into account lots of property. So that's point number one. I think we're looking we're missing the target. We're missing the target by putting our head in the sand and saying this is the standard, this is what we got to live with, but everyone at that table you know that's a lower number, but you don't live where we live."

Response to Oral Comment 4-1: The Department appreciates your comment. This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-1 regarding regulatory standards for PFOS and PFOA and their application to the Interim Response.

Oral Comment 4-2:

"Comment number two, the cost analysis is extremely faulty and emphasizes DEP resources and how much DEP has to pay. When you look at this, what about all the homeowner responsibilities here? Testing costs a fortune. So it's skewed to come up with give everybody a free system if they put a restriction on their deed.

So we're planning to meet a standard that is way too high and over time it's going to be outdated quickly. So let's be smart. Let's not be stupid. Cost analysis. Let's talk about the total cost because clearly that's not you compare the apples and oranges, if you look at putting in a water system, which I would recommend, you're actually resolving a problem. You're giving clean water to the residents and

the residents I'm sure realized that they don't ever have to worry if they have the Perkasie Water Authority taking care of them and they're going to get clean water. I'm not going to get it. That's a value added to their property and something that I think some of the property owners would be find would be to their best interest. That's a solution."

Response to Oral Comment 4-2: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 3-1 regarding the purpose of the Interim Response and the valuation of real estate.

Oral Comment 4-3:

"The tests, looked at the test sites before. I guess DEP based there was a contaminated well so this is ground zero, contaminated well. we're going to do a one mile an arbitrary. I don't know what one mile. I wasn't in that area, perimeter around the well. Well, now we're finding out it's really shifting over to Bethlehem Pike, and this should be an interim report because I think a new line needs to be drawn. If we have a hot spot, you're probably you know, you may be leaving other areas out. I would I would go to ground zero in the area by Bergey's and and see what the test results are."

Response to Oral Comment 4-3: The Department's initial sampling did focus on sampling all residential wells within a one-mile radius from the public supply wells that were taken offline. However, the Department has expanded the area of investigation multiple times based on its investigation. The Department is continuing its investigation of the Site and will continue to assess the need for expanding the area of investigation.

Oral Comment 4-4:

"And the last thing is this mandatory covenant. I'm offended. I don't know how the homeowners feel about it. You're telling me you're going to give them a cookie. You're going to give them a \$2,000 water treatment system, but you got to you're actually going to ask these residents to sign on a document that will be on a deed that will make their properties not very desirable for people to buy? Why don't you just take the high road? These are not bad people. These are good people. So let them have their system. Believe me, they want to maintain it. They don't want the contamination. We don't they don't need a gun to their put to their head by the DEP to tell them they need to change their filters if you go that route, which I wouldn't recommend."

Response to Oral Comment 4-4: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-3 regarding the purpose of the institutional controls.

Oral Commenter #5: Sandra Moyer. Oral Comments transcribed on pages 40 - 41 of the hearing transcript:

Oral Comment 5-1:

"One thing I was curious about, I never we were never contacted by our West Rockhill anything about this well business. In fact, I didn't even know this meeting was taking place tonight until we were interviewed by a wonderful reporter who said now, we were in the newspaper this past week, pictures,

blah, blah, blah, and that's the first I knew that this was even going to be addressed tonight, which is a little discouraging."

Response to Oral Comment 5-1: The Department appreciates your comment. Notice of the opening of the Administrative Record and of the time and place of the public hearing was published in the June 2, 2018 issue of the *Pennsylvania Bulletin* and the June 3, 2018 edition of the *Bucks County Courier Times*. In addition, the Department has created a public website for this Site: https://www.dep.pa.gov/Citizens/MyWater/drinking_water/Perfluorinated%20Chemicals%20%E2%80%93PFOA%20and%20PFOS%20%E2%80%93in%20Pennsylvania/Pages/Ridge-Run-PFC-Site.aspx

This website can also be found by searching: "PA DEP Ridge Run PFAS Site."

Oral Comment 5-2:

"People have mentioned about the property value. Basically, I feel like our house can't even be sold now and I kind of would like to look into downsizing now."

Response to Oral Comment 5-2: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 3-1 regarding the purpose of the Interim Response and the valuation of real estate.

Oral Comment 5-3:

I am a cancer survivor, I hope six surgeries just last year, breast cancer, and, again, my father just passed away who lived here for many years, from lung cancer, you know. And another lady passed away a few years ago. My son—in—law didn't even mention this. She became very concerned about her health over the 41 years and she started drinking water like crazy. she died from this horrible cancer that ended up in her neck.

Response to Oral Comment 5-3: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 2-2 regarding to whom health concerns regarding exposure to PFOS and PFOA may be directed.

Oral Comment 5-4:

"So I just I feel like bring us public water. It would be a sure fix. this is - this is crap. I mean, I appreciate you want to do something, but it's not - I don't feel safe. I will never want to drink that water again after all my surgeries and what I've been through already. Thank you."

Response to Oral Comment 5-4: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-2 for information regarding why Alternative 3 was selected over Alternative 4 and how the Department will ensure the protectiveness of the Selected Response.

Oral Commenter #6: Gerald Moyer. Transcribed on pages 41 - 44 of the hearing transcript.

Oral Comment 6-1:

“You talked about I 'm just concerned you talked about cost effectiveness effectiveness for DEP. Okay? But you' re not looking at our cost effectiveness. I mean, you did a study there three to five years, but you want to say we ' re responsible for one year we ' re we're responsible after one year, which I totally think that's insufficient.”

Response to Oral Comment 6-1: The Department appreciates your comment. This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-3 for a discussion of how the time period of the Interim Response was established.

Oral Comment 6-2:

“It just doesn't add up. The carbonization filters, you know, there's I don't think there's been enough study, I mean, because we 've only known more or less about this PFOA last, what, two, three, four year. I mean, what kind of study has been for these to be effective? This is what I 'm concerned about, especially when you face we've been drinking this water.”

Response to Oral Comment 6-2: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-2 for information regarding how the Department will ensure the protectiveness of the Selected Response.

Oral Comment 6-3:

“So, you know, when you're in the shower, you open your mouth it just feels good to, you know, have you know, refresh. And it ' s easily absorbed by the mouth, you know, and it just makes you think, well, you know, where'd this come from? You know, because I 've always been healthy and then I face health issues because of that. I had a heart valve replaced and that came from the endocarditis that I had contracted.”

Response to Oral Comment 6-3: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 2-2 regarding to whom health concerns regarding exposure to PFOS and PFOA may be directed.

Oral Comment 6-4:

“So I really wanted to - to say that cost effectiveness is not looked at for the - for the residences . And I just think that one year and I believe I was told that that ' s the policy at the DEP is just insufficient . The other part of that is then the homeowner is also responsible for the upkeep of the filter. Okay. Understandable, but also for water testing. And to test this - this PFOS it's not a normal water test. So there you go. You know, you' re I understand as a homeowner the well is your responsibility and you get a water test, yeah, we 've had water tests over the years, but never tested for this .Now all of a sudden we re faced with this and that's another expense.”

Response to Oral Comment 6-4: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-3 regarding sampling and maintenance of the systems.

Oral Comment 6-5:

"The other thing is that we're not really talking about blood testing because I think blood to really get down and dirty with this, to understand what's happening here is we need to do more research on what - what it's really doing to the effectiveness?"

Response to Oral Comment 6-5: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 2-2 regarding blood testing.

Oral Commenter #7: Jeannine Gravel. Transcribed on pages 44 - 45 of the hearing transcript.

Oral Comment 7-1:

"I just wondered if the DEP would consider hiring a professional hydrologist or multiple hydrologists to formulate a study on existing wells within the one mile radius of the contamination just to keep an eye on the plume mobility."

Response to Oral Comment 7-1: The Department appreciates your comment. The Department's investigation of the Site is ongoing. A Licensed Professional Geologist employed by the Department is involved in the investigation of the Site. Additionally, the Department has retained the services of Professional Geologists through its General Technical Assistance Contractor to assist in the Site investigation.

Oral Comment 7-2:

"I don't - I don't think this is an accurate, you know, estimation of the areas affected since not every single person got their well tested. I don't know if there's any way to say, hey, we got everybody has to get it tested to really make the...."

Response to Oral Comment 7-2: The Department does not regulate privately owned residential potable wells and cannot require the owners of such wells to sample for PFOS and PFOA. Site investigation activities are ongoing and include the collection of additional groundwater data to aid in determining the nature and extent of contamination.

Oral Comment 7-3:

".....I'd also love you to - to also have the hydrologists formulate a specific study on the effects of discharging this pad of water up here at the quarry because that's in the area. That's in a one mile radius. There is such a thing as hydrostatic pressure that has a devastating effect on wells.. I don't think any of us wants to have to deal with this in a way that it's - it's happened and then now we can't do anything about it or its devastating effects after. So if you could have a professional hydrologic study done on plume mobility and the potential for the enlargement of the contamination within our wells we'd appreciate it very much."

Response to Oral Comment 7-3: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-1 regarding the purpose of the Interim Response. The Department's investigation of the Site is ongoing, and its findings are being shared with the Department's Mining Program which is responsible for the permitting of the quarry.

Oral Commenter #8: Dave Watt. Transcribed on page 46 of the hearing transcript:

Oral Comment 8-1:

"I'm on Perkasio Regional Water Authority water, so I was not affected by this. I also sit on the Board of Perkasio Regional Water Authority. I just want to put on record that I heard you have a budget, as we all do, on what you can do to fix this. I request that DEP meet with our Board. We're going to have a daytime meeting or a nighttime meeting so we can come up with a possible solution. I believe within a year's time or sooner we could service all 12 of those in red for less than your \$2 million budget, which would leave money left over for the two that you have in arch to put the filters in. And I still think it would be under that \$2 million."

Response to Oral Comment 8-1: The Department appreciates your comment. The Department met with the Perkasio Regional Water Authority, East Rockhill Township, and West Rockhill on August 6, 2018 and with Perkasio Regional Water Authority on August 22, 2018 to discuss the scope, costs, and timeline of the extension of a water line to the Site.

Oral Comment 8-3:

"We've already asked, I believe it was someone in DEP, if they wanted to use those wells for monitoring purposes or if they wanted us to close them. We have not heard back yet, so we offer that, too."

Response to Oral Comment 8-2: The Department appreciates the offer to sample the wells and will contact the Perkasio Regional Water Authority if it determines a need to do so.

Oral Commenter #9: Sue Furlong. Transcribed on page 46 – 47 of the hearing transcript.

Oral Comment 9-1:

"I'm just curious with the \$2 million if there will be some sort of a running total where people can find out, okay, this, this and this person paid X amount to get their system in, so that would reasonable amount. If out to a vendor, you know, just even just that kind of knowledge would be helpful so that they they can control their costs or maybe even four or five people could go together and a vendor would be able to get them a discount, that kind of thing. is there a public accounting for that \$2 million? Let's say that they spend \$1.5 million. Is that remaining amount put into escrow so that if additional problems pop up later the 1.5 is still available? ou know, nobody shuts the book on it. How does that work? That would be my question. Thank you."

Response to Oral Comment 9-1: The Department appreciates your comment. Under the HSCA definition of "interim response," an Interim Response may not exceed \$2,000,000 in cost except in certain limited circumstances. The two million dollars discussed at the public meeting on July 11, 2018 was a reference to this statutory limitation; it is not the available budget for the Site. The

Hazardous Sites Cleanup Fund provides the funding for the Interim Response. Cost is one of the factors that the Department uses to evaluate the proposed interim response actions because it is the Department's responsibility to select a remedy that is cost effective. The Interim Response associated with the installation of filtration treatment systems is estimated to cost \$102,860. There is no escrow account established for the homeowners. Records regarding the costs at the Site are available at the Rachel Carlson State Office Building for review.

As stated in the Department's response to Comment 1-3, at the end of the twelve-month period in which the Department is taking responsibility for the sampling and maintenance of the carbon filtration systems, the Department will evaluate whether any of the circumstances exist that would allow an interim response to exceed twelve months in duration under the HSCA definition of "interim response" and, if so, whether the twelve-month period should be extended accordingly.

When sampling and maintenance of the carbon filtration systems become the responsibility of the homeowners, the Department recommends that homeowners contact multiple vendors and/or laboratories to obtain quotes for this work.

Written Commenter #1: Kelly and Jerry Jameson

Written Comment 1-1:

Sent: Wednesday, July 11, 2018

Subject: Comment about PFC water contamination Ridge Run Site Sellersville PA

Hi Lena,

For 20+ years citizens in our neighborhood have been drinking this poisoned water (re: Ridge Run PFC site).

Within the past 8 years, we've seen neighbors die from colon and breast cancers; a young child taken by leukemia; classmates of my child suffering from Tourette's; and our own child stricken with autoimmune disorders—inflammatory bowel disease and PANDAS.

The EPA has connected all these diseases to PFOA/PFOS exposure.

However, your response does not include PFOA/PFOS blood testing or monitoring for us.

For 20 years, we drank this fouled water. It's irresponsible to tell us everything is okay now that you've closed the poisoned wells and switched our water supply to Perkasio Water Authority. Like the people in Warrington PA who drank the PFC-tainted water from the naval base, we need blood testing and annual health monitoring. We need to be ensured that the PFOS/POS isn't hiding in our hot water tank sediment, continuing to poison us.

I REQUEST:

1. *Testing of our water tank sediment as previously requested in an unanswered email to EPA. If found to be positive for PFOS/PFOA, water tanks should be replaced.*
2. *PFOA/PFOS blood testing for those who drank water supplied by tainted wells.*
3. *Ongoing health monitoring for those victims found with elevated blood levels of PFOS/PFOS.*

The EPA chose not to test any potable water within any of the homes switched over to Perkasio Water. Why didn't you?

Can you guarantee us there are no PFOA and PFOS in our hot water tanks, in our water pump boosters, or our water softeners?

Thank you.

*Kelly and Jerry Jameson
High Point Circle
Sellersville, PA 18960*

Response to Written Comment 1-1: The Department appreciates your comment. This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-1, Response to Oral Comment 2-1, Response to Oral Comment 2-2, and Response to Oral Comment 2-3 regarding the purpose of the Interim Response, testing of drinking water of residential consumers on public supply wells, blood testing, and health monitoring, respectively.

Written Commenter #2 Jodi Cutaiar

Written Comment 2-1:

Sent: Friday, July 13, 2018

Subject: West rockhill residence

Hi!

I was there for the meeting the other night. Here is my voice. I have many concerns along with my neighbors.

1. *My house value came down \$20,000 since the news of this water. Having a carbon filter as you suggest is not going to change that value since it needs to be enclosed in any documents for the house and state. This is my house and have the decision to what I want in my house and it's not carbon filters. That is one more thing I don't want to do or think about. Our home is part of our investment.. I want to expand it and to see value.*
2. *The investigation for your water source contaminate... I thought that was interesting you all said that. Your company samples water. Not soil, not inspect buildings nor investigate material things. The word investigate is a strong word to use.*

4. Please get other authorities involved such as East Rockhill. Please talk to the builder. Please have an open mind to public water and finding that solution can be used in everyone's avenue.

5. The difference between a 3 year money comparison of filter or public. The difference was \$200.00. There are at least 2 things that I don't have to do with public. I would pay the 200 extra. Life is busy enough. I have 2 young kids, run two businesses and my husband travels all the time. I have enough to think about.

I wish you all (on your panel) could put yourselves in this mind frame of our situation. Wouldn't you want a solution that helps your family, your house value and be easier.

Thank you for reading this. Please find a way to public water..

Thank you

Jodi Cutaiar

Response to Written Comment 2-1: The Department appreciates your comment. This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 3-1 regarding the purpose of the Interim Response and the valuation of real estate. Please see the Department's Response to Oral Comment 3-2 regarding the sampling of other environmental media. Please see the Department's Response to Oral Comment 8-1 regarding meetings with municipal officials. Please see the Department's Response to Oral Comment 1-2 regarding why Alternative 3 was selected over Alternative 4 and how the Department will ensure the protectiveness of the Selected Response.

Written Comment 2-2:

Sent: Saturday, July 14, 2018

Subject: Water

Hi again,

I emailed you yesterday about my thoughts on the carbon filters YOU want to put in. HERE IS MORE.

Did you check the soil for contaminants in your investigation?? I am not thinking you did. That will tell you a lot. How deep are the contaminants and if it would "plumm"

Digging 4 feet into the ground for public water would cause the chemicals to shift?

You told a neighbor of mine that if the filters were installed you would stand by for 3 years and stand by and test them. Now you are saying one !?? I saw and read the email.

PLEASE... NO FILTERS. Please talk to the builder, the East Rockhill township leaders and please take our voices and put in public. YOUR PANEL IS NOT LIVING IN OUR HOMES!!

Response to Written Comment 2-2: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 3-2 regarding soil sampling at the Site. Please see the Department's

Response to Oral Comment 1-2 regarding why Alternative 3 was selected over Alternative 4 and how the Department will ensure the protectiveness of the Selected Response. Please see the Department's response to Oral Comment 1-3 regarding the time period of the Interim Response. Please see the Department's Response to Oral Comment 8-1 regarding meetings with municipal officials.

Written Comment 2-3:

Sent: Monday, July 16, 2018

Subject: Re: West rockhill residence

Hi Colin,

Thank you for getting back to me! I sent another email Saturday to Lenna about more concerns I had. Could you also take note of that one as well.

Just FYI. This situation is noted in the Doylestown paper as well. Please find a way to make my neighbors and my house have public water so WE don't have to deal with this anymore!!!

Thanks for taking the time and reading this and making note.

Jodi Cutaia

Response to Written Comment 2-3: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-2 regarding why Alternative 3 was selected over Alternative 4 and how the Department will ensure the protectiveness of the Selected Response.

Written Comment 2-4:

Sent: Tuesday, July 17, 2018

Subject: Re: West rockhill residence

Hi!

I have another concern..

My real estate tax just came in. Not only my house value went down Now my land value went down too. Uhm, that never happens.

Putting in a filter is not going to change any of that. As I stated before. You buy a house for part of an investment. Well.. Right now and, your thoughts of action.. Is not good news for us 12 houses.

Response to Written Comment 2-4: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 3-1 regarding the purpose of the Interim Response and the valuation of real estate.

Written Comment 2-5:

Sent: Wednesday, July 18, 2018

Subject: Re: West rockhill residence

Thanks.. I have more concerns.

I just read an article about PFAS.. IT EAS WRITEN JULY 16TH .. About the harmful facts. The are stating that it's from firefighting foam.

My,question: how many forms are you testing for PFAS? The normal is 6 , but there are 14.

If that is true.. Our filters would get "clogged" faster than you suggest.. Costing us a lot more money after your year of checking.

Thanks for checking into this

Response to Written Comment 2-5: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-3 regarding sampling and maintenance of the systems. Drinking water samples at the Site are being analyzed for PFOS and PFOA via USEPA Method 537 Revision 1.1. PFOS and PFOA are the only two PFAS compounds for which a HAL has been established.

Written Comment 2-6:

Hi.

I have been looking into the longevity of PFOAS and the chemicals chains.

I then looked at the the fire back in 86 at Bergeys. Crazy that over 150, 000 tires were PUT on fire. The description of what happen seems horrifying.

My question to you guys.. If you have it...

The EPA came out 2 days after the fire and tested the water because of the foam that was used. The effects were know to contaminate water..., why was there no follow ups like in a year, 2 years. 5 years

It takes more than 2 days for anything like foam to get to the water table since there is not a actual water source.. Ie, creek or pond. The EPA and the DEP kinda lost us or someone had an answers and that seemed good enough!!!!

The proper people who do these test should have know to come back times later and tested the water.. The other articles I read where the foam was used.. Water was tested later and so was soil and blood samples were done.

Nothing like that has happened here before or even now to that extent.. Why not

Response to Written Comment 2-6: The Department has no records regarding sampling performed by the United States Environmental Protection Agency in 1986. In August 2016, the North Penn Water Authority conducted sampling for six PFAS in two public water supply wells in East Rockhill Township in accordance with the federal Unregulated Contaminant Monitoring Rule 3. Analysis of these samples detected combined concentrations of PFOS and PFOA of 117 ppt and 70 ppt in these wells, both at or above the HAL. Approximately 167 properties have been sampled by DEP in the subsequent investigation of privately owned wells in the surrounding area.

Written Comment 2-7:

Sent: Tuesday, July 31, 2018

Subject: Re: West rockhill residence

Hi..

I know you are not going to answer my questions right now, but I want this down in my stock pile of questions I have. And I hope they are answered at the end of this public comment time.

So, in doing more research. What relation do you have with the EPA in dealing with water issues such as ours?

The reason I ask, the contamination in our area was in 1986. 2 days later the EPA came out to test the local water. In 1997 it is stated in documents that foam was toxic and started to test areas in about 2001.

Most of the areas tested were military based. My second question is this.. And others

If documentation in 97 was stated and testing to certain areas in 2001. Why were we not on the list??

Why didn't the EPA come out like they did the first time in 2001. Why are you in charge of this area and the EPA is in charge of Willow Grove area??

Thanks for taking a read and I hope to hear these answered in upcoming meetings

Response to Written Comment 2-7: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Written Comment 2-6 regarding USEPA involvement at the Site in 1986. The Department's investigation of the Ridge Run PFAS HSCA Site is being conducted under the Hazardous Sites Cleanup Act of 1988 which grants the Department the authority to investigate the release, or threat of release of hazardous substances or contaminants in the Commonwealth of Pennsylvania. The former Naval Air Station Joint Reserve Base Willow Grove is a federal Superfund Site, being investigated under the federal Comprehensive Environmental Response, Compensation and Liability Act of 1980 by the United States Navy with USEPA and Department oversight.

Written Comment 2-8:

Sent: Thursday, August 02, 2018 3:21 PM

Subject: West rock hill

Hi again.

This water situation we have is more complex far more than I ever first thought.

So... I have another question and I would love an answer now, but I know later and looking forward to this later too.

I discovered that there are 3 chains in the PFAS. You only were testing for 2. Why not test it all. PFC is the third chain and it too is in foam of fighting fire and other solvents.

I saw the other 2 are able to stick to fats and the other chain sticks to more protein and. All of these chemicals are horrible on so many levels.

Again, why did you only test for 2.. not all 3?

That could be in our water source, clog up filters or maybe not be held back by a filter!?
Another reason why to give us public water.
I look forward to the auto response.
Jodi Cutaia

Response to Written Comment 2-8: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Written Comment 2-5 regarding sampling for PFAS at the Site and sampling and maintenance of the systems.

Written Comment 2-9:

Sent: Monday, August 13, 2018

Subject: West rock hill

Hi to the both of you.

I never imagine in my life time that I would be doing so much research and discovery about water, especially my water.

From the start of learning about the fire and what was used, man power and what happened in the aftermath made me think more about burning tires.

Yes, burning tires! The outcome of what happens when rubber is set on fire. In our case at least 50,000 tires! There was a study about burning tires in 1989. That was 3 years later from our disaster. More studies and discoveries in 1992.

Results: PAHS and BaP were found. Yeah, the large cancer combo was found.

Burning tires are 3 to 4 times more greater than other burning components.

My question, and I know you can't answer but I am expecting an answer after the final decision, the EPA knew about this because it was their study. Why not do more and investigate soil, water.. scum from tire fire is huge and not even in your water test.. but.. you are just testing Only 2!! No more because your not a 100% certain on the explanation of why we have our problem. Right!?

This whole water situation at this present time could of been avoided if we were not a small community with someone trying to not make a big deal of 1000's of tires burning and then foam being used. Let's do the right thing this time and not make history repeat itself.

I hope you both have a great rest of your week and I am looking forward to the decision date.

Jodi Cutaia

Response to Written Comment 2-9: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Written Comment 2-6 regarding USEPA involvement at the Site in 1986 and sampling for PFAS at the Site. If during the investigation of the Site, releases of additional hazardous substances or contaminants are discovered, the Department will amend the analysis of the samples at the Site.

Written Commenter #3: Jessica Conrad**Written Comment 3-1:**

Sent: Thursday, July 19, 2018

Subject: Water

Hello Lena, I was wondering where are standing. I know there was a meeting. Not much information there that we didn't all ready know. I am very concerned about having filtration systems put into place here now. One issue I foresee is our homes will still be contaminated. No person in their right mind would purchase a home with contaminated water. Filter system or not. A filtration system will only last for so long and how are we to know if contaminants would not pass through this prior to the regular maintenance? Interesting fact to know that one part of a person's body that does not absorb water is through the skin. However it's also a fact that certain chemicals can be absorbed through the skin. Is there testing done on these chemicals to see if this is a fact? I know we are not to ingest the water, but how do we truly know damage is not being caused in other ways or has already been done? I see no other testing being done to prove these points. I also see no other investigating going on to find out who is at fault. Who is at fault? Not the homeowners dealing with this. How do we know that years of drinking this water has not onset certain health conditions that may have otherwise been prolonged? No further testing again. You have only been testing for a little over a year and have seen the fluctuation on the properties. How do we now we were not at very dangerous levels for years after the fire and up until 2 years ago? We dont! I have lived in my home for 18 years now. Your not living with this problem, we are. My home has depreciated due to this, Not yours. I feel we should now be provided public water to resolve this issue. What is being done? What is the next step? More meetings? more testing? No resolutions!

Response to Written Comment 3-1: The Department appreciates your comment. This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 3-1 regarding the purpose of the Interim Response and the valuation of real estate. Please see the Department's Response to Oral Comment 1-3 regarding sampling and maintenance of the systems. Please see the Department's Response to Oral Comment 2-2 regarding to whom health concerns regarding exposure to PFOS and PFOA may be directed. Please see the Department's Response to Oral Comment 1-2 for information regarding why Alternative 3 was selected over Alternative 4 and how the Department will ensure the protectiveness of the Selected Response.

Written Commenter #4: Angela Goodwin. Attachments to the August 30, 2018 e-mail are included as Appendix A.

Written Comment 4-1:

Sent: Thursday, July 19, 2018

Subject: RE: [EXTERNAL] ridge run

*Hi Lena,
Soil testing was mentioned but I did not hear when this will take place and what properties you will be sampling?
Please let me know,
Thank you,
Angela Goodwin*

Response to Comment 4-1: The Department appreciates your comment. This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 3-2 regarding soil sampling.

Written Comment 4-2:

Sent: Tuesday, July 24, 2018

Subject: RE: [EXTERNAL] ridge run

*Colin,
Thank you for responding to me after almost a week, but you did not address my question AT ALL, instead you talked around it.
A year ago I was told that soil testing would be done and at the meeting it was mentioned. I would like to know when this will be done?
I appreciate you will share your findings with us but we (the homeowners) have a lot we are losing here. I can tell you personally that we have done a lot to our home and we have just lost all the value that we worked for. I would like to invite anyone of you to my property and I will show you exactly what I am talking about. This is not a trailer park, we cannot just hook up our homes and move. I have good neighbors, we look out for each other, we do not deserve to be going thru this.
Only your office has the authority to do the testing and we need all the help you can give us.
Thank you for your time,
Angela Goodwin*

Response to Written Comment 4-2: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 3-2 regarding soil sampling. Please see the Department's Response to Oral Comment 3-1 regarding the purpose of the Interim Response and the valuation of real estate.

Written Comment 4-3:

Sent: Thu, Aug 30, 2018

Subject: Fwd: Comments for Ridge Run contamination

1) Our families health, our property values and our community have been compromised and the only thing that would help is public water. Would you buy a home with a contaminated well?

- 2) *The filtration system does not have an alarm system to let us know when the filter needs to be replaced. We could have our water tested and then 6 months later the filter could be bad. We would then be back to dealing with contaminated water and not even know it. We would always be worried about using too much water and the filter needing to be replaced. People have pools and hot tubs that need to be filled occasionally, we would be afraid to do that because of the filters. We will never be able to lead a normal life with the filtration systems.*
- 3) *You mentioned that if you shut down wells the contamination could go elsewhere. Well the highest levels are right around Bergey's property, so "A" why are we supposed to be punished for something that we had nothing to do with and not control over, "B" what about new wells going in, you will be drilling new wells to keep checking will the water, new homes go up all the time and what if current residents need new wells, that also can change things.*
- 4) *You mentioned at the meeting that after you finish your investigation you will be going after the party you feel is responsible for this. You mentioned that we would then have to go after this party to recoup our lose, but we have reached out to 7 attorneys and we have not been able to get anyone to represent us. We are too small of an area and they all seem to be representing residents around the Navel Air Force Base. So without public water the residents with contaminated wells really have no value in their properties and no way to recoup any losses, plus we have to hope our health is not affected.*
- 5) *Representatives from East Rockhill Township and Perkasie Water Authority were present at this meeting and they mentioned they could bring us public water for under DEP budget amount, but DEP mentioned that private wells are really not their concern, that private wells are the responsibility of the owners. We the owners did not cause this contamination, it would be nice to have our government looking out for us.*
- 6) *We all know that the responsible party is Bergey's. I have copies of newspaper articles from back in 1985 and 1986, they had tires piled up for 5,6,7 years. Per the township comments that was not allowed. The year before the fire they were supposed to be cutting them in half and recycling. You can tell from the pictures from the fire they were not. They had over 3 million tires piled up. If there was not so many tires piled up they may not have had to use the spray foam. According to the one article "it really did not help".*
- 7) *From what I was told this spray foam was all over my property and the neighbors (we purchased our property in 2000 and the tires were/are in trailers). The previous owner and neighbors had asked the township and fire department about coming back to clean this up but no one responded. As of this point the soils on my property may also be contaminated and I have asked about doing soil testing but I get no response.*
- 8) *There is a retention basin behind my property. This basin use to drain on the vacant lot next to my property. Back in 1986 after the fire the EPA monitored the clean-up of Bergeys and the water in the basin. After it was okay they allowed this water to be released. EPA then test the stream that they THOUGHT this water was draining too but it never made it that far. As of this point the soil all around my property could very well be contaminated and we still deal with water running from Bergey's property onto mine.*

Public water is in our best interest and should not be what fits in a budget, especially when you are talking about someone's health.

I have attached 2 pictures of plants that I did an experiment on. They were both planted at the same time: I used the same soil in both pots. I gave them the same amount of water at the same time. The only difference was I used bottled water for one and well water for the other. I did not use fertilizer on either one.

Look at the difference between the 2 plants in only a month with little sun. Now think what they would be like after a couple months. So what is happening to our health from our water?

It would be nice if we the residents would have a vote on what you would like to do with OUR properties.

*Thank you,
Angela Goodwin
[REDACTED] Tabor Road
Sellersville, PA*

Response to Written Comment 4-3: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 3-1 regarding the purpose of the Interim Response and the valuation of real estate. Please see the Department's Response to Oral Comment 2-2 regarding to whom health concerns regarding exposure to PFOS and PFOA may be directed. Please see the Department's Response to Oral Comment 1-2 for information regarding why Alternative 3 was selected over Alternative 4 and how the Department will ensure the protectiveness of the Selected Response. Please see the Department's Response to Oral Comment 1-3 regarding sampling and maintenance of the systems. Please see the Department's Response to Oral Comment 3-3 regarding the installation of monitoring wells. Please see the Department's Response to Oral Comment 1-4 regarding Potentially Responsible Parties at the Site. Please see the Department's Response to Oral Comment 8-1 regarding meetings with municipal officials. Please see the Department's Response to Oral Comment 3-2 regarding soil sampling at the Site.

Written Commenter #5: Tracy Carluccio Attachments to the e-mail are included as Appendix B.

Written Comment 5-1:

Sent: Monday, August 6, 2018

Subject: Comment Ridge Run PFAS HSCA site, East and West Rockhill Twps., Bucks Co.

Dear Ms. Harper,

Please find attached a copy of testimony submit by Tracy Carluccio, Deputy Director, Delaware Riverkeeper Network at the PADEP July 11 hearing. This comment may be slightly different than that verbally presented due to shortening the length due to time constraints at the hearing.

Also please find copies of the technical reports commissioned by Delaware Riverkeeper Network regarding:

- PFOA: Recommended MCL; PQL; Treatment Options (3 PDFs)
- PFOS: Recommended MCL; PQL; Treatment Options (1 combined PDF)

Please consider these reports as supporting the testimony made to PADEP at the July 11 Hearing and in the written version of that testimony attached hereto.

Thank you for the opportunity to submit these written comments,
Tracy Carluccio

Response to Written Comment 5-1: The Department appreciates your comment. This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-1, Oral Comment 1-2, Oral Comment 1-3, and Oral Comment 1-4 regarding your testimony at the July 11, 2018 hearing. The Department will evaluate which filtration systems will be most effective at the Site, install those systems, and monitor them for one year to make sure that they are working as intended.

Written Commenter #6: Sheri D'Ginto

Written Comment 6-1:

Sent: Monday, August 13, 2018

Subject: Water Issue

Ms. Harper,

We at [REDACTED] Old Bethlehem Pike would like to voice our opinion on our water issue, we would like to go on record as requesting we have public water piped in to our residence. There are several reasons we request this, First we agree with Mr. Watt that there is a better way to pipe in the 12 effected homes for far less then quoted and we do not agree it will shift any contaminants to other water systems. Second, this property is commercial and we have a business here that requires the use of large amounts of water and safety of our customer is #1 priority. Third I am a disabled individual and I would not be able to maintain any kind of water filter system, not to mention I am on a fixed income and would not be able to afford another maintenance bill. Finally we do not except a carbon filter system as a permanent fix to this problem. Who would be responsible for damages to health etc.. if we find out later that filters did not 100% eliminate the pollution in the water. Public water is the only way to assure 100% that our drinking and bathing water is safe and we feel it should be up to the effected homes/People to decide on a solution and with no time frame to do so, no one else. We will get into personal damages and financial damages at a later date. Sign us up for Public water please.

Thank You

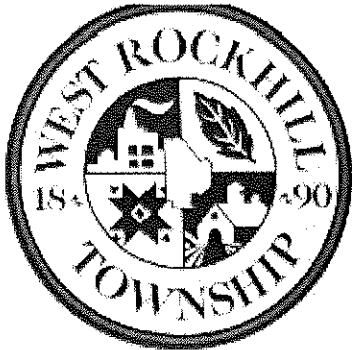
Sheri

Response to Written Comment 6-1: The Department appreciates your comment. This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-2 for information regarding why

Alternative 3 was selected over Alternative 4 and how the Department will ensure the protectiveness of the Selected Response.

Commenter #7: West Rockhill Township

Written Comment 7-1:



West Rockhill Township

1028 Ridge Road
Sellersville, PA 18960
215-257-9063
Fax 215-257-0701
www.westrockhilltownship.org

August 20, 2018

Lena Harper PADEP-SE Regional Office
2 East Main Street
Norristown, PA 19401
lharpers@pa.gov

Re: RIDGE RUN PFAS SITE

Dear Lena,

The West Rockhill Township Board of Supervisors is requesting PADEP to provide Public Water connections to all affected property owners within West Rockhill Township. The Township position is that PADEP will cover all costs associated with connecting homes to the public water supply system.

If you have any questions or concerns please contact my office.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Lippincott', is written over a light blue horizontal line.

Greg Lippincott
Township Manager

C: West Rockhill Board of Supervisors
File

Response to Written Comment 7-1: The Department appreciates your comment. This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-2 for information regarding why Alternative 3 was selected over Alternative 4 and how the Department will ensure the protectiveness of the Selected Response.

Written Commenter #8: Chris LaBelle

Written Comment 8-1:

Sent: Tuesday, August 21, 2018

Subject: Carbon filters vs Public water

I live at [REDACTED] Old Bethlehem Pike (almost, but not quite across the street from the end of Tabor Road), and my neighbors stopped by yesterday to discuss our wells and the Bergey's Tire Fire potential contamination. They sought to persuade me to support the installation of public water service. Sadly for them, I do not.

When I found out that there might be a problem, I did just a little research and discovered that the way to mitigate the problem was to use a carbon filter. So I bought one. The public utility will treat water the same way - with a carbon filter.

My neighbors are concerned with the cost of these filters. I agree - it's an expense I did not have a year ago. However, in my experience, the proposed \$750 per year it will cost is still less than another utility bill for the year. The neighbors also are suggesting that Bergey's help pay for the solution. Why would they? Bergey's didn't start the fire, it was determined to be arson. Find the arsonist and bill that person. Additionally, Bergey's didn't specifically ask the Navy to come up from the Willow Grove Naval Air Station and use chemical-laden foam to try to suppress the fire. Send the bill to the Navy. (It appears that the military found out multiple years after this incident that the foam chemicals had health risks, so maybe don't send them the bill. They were acting in good faith it seems.)

Finally, President Reagan was right when he said, "The nine most terrifying words in the English language are, 'I'm from the government and I'm here to help.'" Municipal water being supplied to these homes is no guarantee of safe water being supplied, as we learned from Flint, Michigan. I will take responsibility for providing safe water for my family, thank you very much.

Chris LaBelle, MS

Lecturer

Department of Chemistry & Biochemistry

Holroyd Science Center 343

Response to Written Comment 8-1: The Department appreciates your comment. The Department has selected Alternative 3, the installation of Whole-house Filtration Systems with Restrictions on the Use of Groundwater as the Interim Response at the Site.


Written Commenter #9: Andi Stephenson**Written Comment 9-1:**

1. *Charcoal Filters not a permanent/fail-proof solution. Too many variables.*
1. *Don't care for the fact that mention of water issues would be added to property deeds...*
2. *Long term public water solution and maps have indeed been discussed and shared with DEP as per East Rockhill Township official.*
 1. *Lines would run up Park/Old Beth Pike up to and including the Lapp properties, an "L" at Three Mile Run Road would run up to Tunnel Road, an "L" at Hill Road would run up to Stone Edge Road, where the line would connect to the Ridge Run Development current system.*
 2. *Two million dollars of DEP funds have been promised and earmarked for the public water project. East Rockhill and West Rockhill are teaming up to come up with the remaining 1.3 million for the overall project.*
 3. *Other than future quarterly water fees, there would not be an expense to the property owners that would be mandated to hook up to the public water.*
 3. *Eye-witness account regarding the concealment of excess tires and foam product at time of the Bergey fire in 1986 are prevalent. Many burnt tires were removed from the property after the fire, some were not and these and the excess foam were buried.*
 1. *Has this witness account been taken seriously?*
 2. *Has the DEP conducted tests to the burn site that is now covered with macadam?*
 3. *Will there be test of the area in the future?*

I look forward to future meetings where additional information and discussions can take place with other affected neighbors.

Regards,

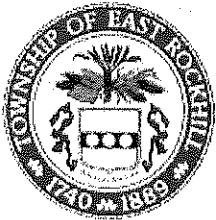
Andi Stephenson

 *Hill Road
Sellersville, Pa 18960*

Response to Written Comment 9-1: The Department appreciates your comment. This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-2 for information regarding why Alternative 3 was selected over Alternative 4 and how the Department will ensure the protectiveness of the Selected Response. Please see the Response to Oral Comment 1-3 regarding Environmental Covenants. Please see the Department's Response to Oral Comment 8-1 regarding meetings with municipal officials. Please see Response to Oral Comment 9-1 regarding the two million dollars statutory limit on Interim Responses. Please see the Department's Response to Oral Comment 3-2 regarding the Department's ongoing investigation of the Site.

Written Commenter #10: East Rockhill Township

Written Comment 10-1:



**EAST ROCKHILL TOWNSHIP
BOARD OF SUPERVISORS**

1622 N. RIDGE ROAD, PERKASIE, PA 18944
PHONE (215)257-9156 FAX (215)-257-1299
www.eastrockhilltownship.org

August 29, 2018

Via Electronic Mail to LHarper@pa.gov

Lena Harper
PADEP-SE Regional Office
2 East Main Street
Norristown, PA 19401

**RE: RIDGE RUN PFC SITE
PUBLIC COMMENT**

Dear Lena,

On behalf of the East Rockhill Township Board of Supervisors, please let this serve as the comment letter from the Township. At the August 28, 2018 public meeting, consensus of the Supervisors is for public water connection to take place to as many properties effected per the Ridge Run PFC investigation results.

East Rockhill Township will support DEP requirements to abandon and fill in all private wells and enact a mandatory water connection ordinance for properties within 100 feet of the water main. It is understood there will be no cost to the homeowners.

Thank you for your consideration and your efforts with this investigation. Should any additional information be required, please do not hesitate to contact me.

Sincerely,

EAST ROCKHILL TOWNSHIP

Marianne K. Morano
Township Manager

Cc: file

Response to Written Comment 10-1: The Department appreciates your comment. This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-2 for information regarding why Alternative 3 was selected over Alternative 4 and how the Department will ensure the protectiveness of the Selected Response.

Written Commenter #11: Emily Geib

Written Comment 11-1:

Sent: Thursday, August 30, 2018

Subject: Ridge Run PFAs - Public Comment

Hello Ms. Harper,

I am writing my public comment in response to the PFAs in the Ridge Run Development in East Rockhill Township, PA.

It is completely unacceptable that:

- 1) The source of the PFAs has not been discovered, leaving the DEP to pay for remediation, and leaving citizens to wonder if this may occur again, or occur in other places. The responsible party needs to be determined, and held responsible for the remediation costs.*
- 2) The residents deserve to have COMPLETE remediation of this issue in the form of permanent connection to public water. It is unfair to install systems in their homes that they will be responsible for maintaining into the indefinite future, and will have to pass along to any new home buyer. I can see how that could possibly be reducing their property's value.*

I am also concerned about an already compromised water system that is about to be taxed further by the Rockhill Quarry's re-opening, and the unethical behavior of RE Peirson (the company currently operating illegally at that site), that has applied for further, larger scale operations there (namely, a 1000 ton per hour crusher). I do not trust them to operate anything so large and dangerous in our community. I believe their history should prevent them from being given any further ability to damage our town. At the very least, extensive hydrological surveys and meaningful, enforceable restrictions need to be set into place. They will be using massive amounts of water, draining the quarry pit, and they already have issues with adequate surface and storm water management. Not to mention the fact that their traffic study didn't even touch on the more than doubled amount of truck trips that the proposed increase would generate. Will they be washing these trucks on site? What sort of chemicals may be washed into the soil and ground water from that?

Thank you,

*Emily Geib
East Rockhill Township, PA*

Response to Written Comment 11-1: The Department appreciates your comment. This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-4 regarding Potentially Responsible Parties at the Site. Please see the Department's Response to Oral Comment 1-2 for information regarding why Alternative 3 was selected over Alternative 4 and how the Department will ensure the protectiveness of the Selected Response. Please see the Department's Response to

Oral Comment 3-1 regarding the valuation of real estate. Please see the Department's Response to Oral Comment 7-3 regarding the quarry.

Written Commenter #12: Ryan Gottshall

Written Comment 12-1:

Sent: Friday, August 31, 2018

Subject: Public comment Pennridge PFA

Public comment regarding PFAs in Pennridge water system.

I am formally requesting that a complete hydrological and geological survey of the surrounding areas that includes the PFA Zone in question as well as the zone included in the one-mile radius which includes the East Rockhill Quarry location be fully surveyed from a hydrological and geological impact standpoint by a legitimate hydrologist and geologist external of the DEP to evaluate the potential impact of reopening the quarry to permitted operations never before seen at this location. This survey should include the impact of a massive mining operation, drainage of the pit, massive amount of water usage to support the new enormous mining operation to inform the township and residents of what could be in store and truly be proactive in protecting the environment instead of spending years and wasting money applying after-the-fact band-aids. Public water is not a miracle fix for the entire area if the quarry operations aren't taken into account and closely regulated to protect the environment.

Sincerely,

Ryan Gottshall

Response to Written Comment 12-1: The Department appreciates your comment. This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Response to Oral Comment 7-3 regarding the quarry.

Written Commenter #13: Kimberly Gottshall

Written Comment 13-1:

Sent: Friday, August 31,

Subject: Public Comment Re: Pennridge PFA Contamination

Public comment regarding PFAs in Pennridge water system.

I am formally requesting that a complete hydrological and geological survey of the surrounding areas that includes the PFA Zone in question as well as the zone included in the one-mile radius which includes the East Rockhill Quarry location be fully surveyed from a hydrological and geological impact standpoint by a legitimate hydrologist and geologist external of the DEP to evaluate the potential impact of reopening the quarry to permitted operations never before seen at this location. This survey should include the impact of a massive mining operation, drainage of the pit, massive amount of water usage to support the new enormous mining operation to inform the township and residents of what could be in store and truly be proactive in protecting the environment instead of spending years and wasting

money applying after-the-fact band-aids. Public water is not a miracle fix for the entire area if the quarry operations aren't taken into account and closely regulated to protect the environment.

Sincerely,

Kimberly Gottshall

Response to Written Comment 13-1: The Department appreciates your comment. This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Response to Oral Comment 7-3 regarding the quarry.

Written Commenter #14: Perkasio Regional Water Authority. Four attachments to the August 31, 2018 e-mail are included in Appendix C.

Written Comment 14-1:

Board Members:

Chairman
David Weiser

Vice-Chairman
J. Thomas Heim

Secretary
Debra Wenzel

Treasurer
Stephen Alper

Asst. Sec. At-Large
David Brallier



PERKASIE REGIONAL AUTHORITY

Providing Water and Wastewater Service Since 1903

Staff

Manager
Michael J. Kelly

Engineer
Peter J. Koscianka, P.E.

Self-Inspector
John DeLoatch III, P.E.

Web Site
www.perkasiepa.gov

August 10, 2018

East Rockhill Township Supervisors
1622 N. Ridge Rd.
Perkasie, PA 18944

West Rockhill Township Supervisors
1028 Ridge Rd.
Sellersville, PA 18960

Department of Environmental Protection
Southeast Regional Office
2 E. Main St.
Norristown, PA 19401
Attn: Ragesh Patel

RE: Ridge Run PFC Contamination

Dear Supervisors and Mr. Patel:

A joint meeting, with representatives from DEP, Perkasie Regional Authority (PRA), East Rockhill Township and West Rockhill Township, was held at the Perkasie Regional Authority offices on August 6th to discuss the potential of extending public water mains to some of the affected homes of the Ridge Run PFC contamination. The major items of concern are the current contamination, the ability to control any potential plume shift and the swiftness in which the solutions can be carried out.

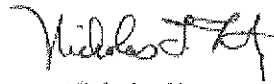
Perkasie Regional Authority has directed its Engineer to look into the feasibility and cost of extending water mains to the majority of the affected area. In the event that water mains are extended as part of the contamination solution, our understanding is that DEP would require the following:

- 1) All private wells would need to be abandoned and filled.
- 2) Both East and West Rockhill Townships would be required to pass Mandatory Connection Ordinances for all properties within 100 feet of the water main, per DEP requirements.

- 3) The cost of connection to each homeowner with a private well would be \$0.00, provided that all DEP requirements are met.

A follow-up letter with cost estimates and maps will be provided once the PRA Engineer has conducted the due diligence. If anyone has any questions, comments or concerns please feel free to reach out to Nick at 215-257-3654.

Regards,



Nicholas Fretz
PRA Manager



David Watt
PRA Chairman

Response to Comment 14-1: The Department appreciates your comment. This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department’s Response to Oral Comment 1-2 for information regarding why Alternative 3 was selected over Alternative 4 and how the Department will ensure the protectiveness of the Selected Response.

Written Comment 14-2:

Good Afternoon All,

I wanted to get everyone some final estimates and options along with a brief explanation of each, since today is the last day for comments.

Option #1:

This option is an all-encompassing option that includes over 11,700 linear feet of water main. In order for PRA to provide service to this entire area, a booster pump station would need to be installed at the Authority water tank. Although that cost of roughly \$1.3m is included in this estimate, that Authority Board would contribute this cost towards the project to install the pumps and generator.

Option #2:

This option is a slightly slimmed-down project with over 7,100 linear feet of water main. Since there are financial concerns with providing service, this option is a viable option because it is under the \$2m threshold that DEP is legally allowed to spend on the contamination clean-up and this will serve all of the customers with private wells above the 70 PPT HAL. In addition, since the water mains in this option do not extend as far north on Old Bethlehem Pike compared to Option #1, a booster pump is not needed to provide service.

If anyone has any questions or would like a more detailed explanation, please don't hesitate to call or contact me.

Thanks and I hope everyone has a great holiday weekend.

Nick

Response to Written Comment 14-2: This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-2 for information regarding why Alternative 3 was selected over Alternative 4 and how the Department will ensure the protectiveness of the Selected Response.

Written Commenter #15: Gerald Moyer.

Written Comment 15-1:

Sent: Friday, August 31, 2018

Subject: Ridge Run Well Contamination Written Response

I am writing to express my strong concerns about PA DEP's proposed response to allow clean water for the affected residents of the Ridge Run contaminated PFAS site. I fully feel the whole-house carbon filtration system is a short term solution only and that a long term permanent solution needs to be considered. Therefore, I want to be on record saying that connection to the available public water system that is already in place approximately 1/4 mile from our homes be made for a permanent and viable solution.

I am concerned that the whole-house carbon filtration system is a way for the PA DEP to fix the problem of PFAS contamination for the current affected 12 wells for the least amount of time and money and fits within the constraints of their budget and not what is best for the residents. This is evidenced by offering only a 1 year maintenance agreement and pay for the first carbon change out, if needed within the first year. But, according to DEP, One sampling event and one filter maintenance event are estimated to be needed once every 3-5 years. So the DEP is only paying for a sampling event within that first year! Remember, after one year, maintenance is then the responsibility of the homeowner. I believe this is woefully short of responsibility by the DEP and the other parties accountable. Additionally, the residents would be required to sign a covenant for maintenance of carbon filtration system and make aware to other parties that the wells are contaminated.

Please accept this as my on the record written response to the Ridge Run PFAS contamination clean-up proposal. My recommendation and hope is providing the connection to the already available public water supply is the plan selected by the PA DEP!

Thank you,

*Gerald M. Moyer
[REDACTED] Tabor Road
Sellersville ,Pa 18960*

Response to Written Comment 15-1: The Department appreciates your comment. This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-2 for information regarding why Alternative 3 was selected over Alternative 4 and how the Department will ensure the protectiveness of the Selected Response. Please see the Department's Response to Oral Comment 1-3 regarding sampling and maintenance of the systems.

Written Commenter #16: Peter McClennen. Attachments are included in Appendix D.**Written Comment 16-1:**

August 31, 2018

On July 10, 2010 Anderson Engineering gave me this plan when a developer took me to his office for a meeting.

For a couple of years Anderson Engineering had been trying to establish water and sewage lines in West Rockhill Twp. on Bethlehem pike between Rt. 563 and the 3 Mile Run Creek, as indicated by the green lines on this map. It was suggested that the sewage could be diverted to a sewage pump located on my property. The location was to be at the site of a well I had drilled in the late 1980's. Of course I told them no.

When I had this well drilled a county inspector claimed it to be one of the best wells in Eastern PA. Ever since the well was established a few people have discouraged any use of it being used in a public capacity. This well produces over 400 gal. per minute of beautiful water, with a PFOA of less than 3, that runs out of a 1 1/2" pipe into the 3 Mile Run Creek.

Actually this system could supply water and sewage to a majority of the area in West Rockhill Twp. north of the Ridge Road. If nothing else the well could supply good water to the folks on Old Bethlehem Pike and Tabor Road.

Can you imagine bathing in or drinking the water they have now, even with a filter? This could bring them much needed sewage as well as water and it could happen now at a much more reasonable cost to the homeowners. I hate to think of the mental suffering as well as the physical problems these people have been going through.

The other plan submitted shows the large wet land between Bethlehem Pike and Old Bethlehem Pike caused by the bridge but mainly by the old Liberty Bell trolley bridge abutments. This would favor the sewer line being on the North side of the 3 Mile Run Creek.

PCMC

Response to Written Comment 16-1: The Department appreciates your comment. This comment is similar to previous comments, so the Department will refer you to its responses to those comments. Please see the Department's Response to Oral Comment 1-2 for information regarding why Alternative 3 was selected over Alternative 4 and how the Department will ensure the protectiveness of the Selected Response.