

John Mefford

Individual Public Comment on the Per- and Polyfluoroalkyl Substances Draft Chemical Action Plan (October 2020)

Thank you for allowing my voice to be a part of what will become the final PFAS Chemical Action Plan. I appreciate the efforts by the Departments of Ecology and Health in jointly drafting this advisory to recommend actions to protect human health and the environment.

My family drinks from a private water well as do all of my neighbors. Yet, I read the Draft CAP with the understanding that there are certain realities in dealing with the PFAS issue. One is that testing and treating for PFAS in drinking water is expensive. Thus, the Plan takes the utilitarian approach by focusing on public water systems, specifically Group A systems. Group A public water systems serve 85% of state residents. Group B systems are another public water system which serves 1.5% of state residents. The remaining population, about 13.5%, uses private residential water wells. The estimated population of private well users in Washington State is over 1 million people.

Testing of the water quality of a private well is largely the domain of the property owner. The most commonly tested analytes are nitrate and coliform bacteria but there is no mandated requirement that one even has to test a private well. There is a state regulation that governs construction of water wells, Chapter 173-160 WAC; however, there are certain specifications such as the depth of the well that can vary greatly. Naturally, there are costs associated with drilling a deeper well, costs related to installation such as labor and materials. I would guess that less affluent people tend to have shallower wells. So, it is quite likely that we can reasonably view the picture of private well ownership through the lens of environmental justice. Indeed, the drafters of the plan recognize that "exposures to PFAS-contaminated water may be disproportionately borne by populations who do not have the financial means to test for and remove these contaminants."

This draft report mentions sampling of private wells near PFAS sites associated with military facilities. However, this sampling is incidental to a particular release source usually associated with the training activities at these facilities.

I have been reading about the Ridge Run PFAS site in Pennsylvania. You can access the site information at

https://www.dep.pa.gov/Citizens/My-Water/drinking_water/PFAS/Pages/Ridge-Run-PFC-Site.aspx.

This site is unusual since the PFAS contamination results from firefighting activities not typically associated with the types of sites listed in the Draft CAP. This particular PFAS release resulted from actual firefighting off-base by military fire units assisting local fire departments to respond to the Bergey's tire fire. The number of tires was estimated at about 150,000 tires stored in an area measuring 300 feet long, 100 feet wide and 40 feet high. It took about 21 hours to extinguish the fire (Lowry, Tom, Suspicious' Tire Fire Quelled After 21 Hours, The Morning Call, November 30, 1986). It is estimated that three million gallons of water together with aqueous film-forming foam (AFFF) were used to fight the fire. One can imagine the magnitude of that hydrologic recharge which possibly accounts for the depth at which groundwater contamination was found.

Note the date of the occurrence of the release. Significantly, the PFAS contamination was not detected until August 2016 when the North Penn Water Authority conducted voluntary sampling of public supply wells. From February 2017 through October 2019, the Pennsylvania DEP contacted residents and sampled 156 private wells in the area. Fourteen of those wells demonstrated groundwater concentrations that exceeded the USEPA lifetime Health Advisory Level (HAL) of 70 ng/L (parts per trillion). The families using those 14 wells were exposed to PFAS for about 30 years.

One could say discovery is subject to the vagaries of circumstance. I provide this as a cautionary tale with a recommendation to search for this type of site in Washington State. The first step is identification. Do we have sites that resemble this scenario? I understand this can be a very touchy subject. I read through some of the public comments. Though health concerns are expressed, it seemed that the majority of the comments were concerns about property value. The magnitude of the problem from a health perspective appears somewhat obscured in public knowledge. In any case, I see this potential scenario as a moral and ethical issue for state government to investigate and properly handle as wisely as possible.

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