

Chris Greene

Thanks for the opportunity to comment. See attached Word file.

Thanks for the opportunity to comment. I did a brief review, focusing mainly on site investigation, risk assessment, and Environmental Justice.

Pg. 6: could you define “responsible party” and “non-responsible party?”

Pg. 6-7: In addition to wells, what about surface water sampling and withdrawals/uses? (I see this is partially addressed later under Action 2.)

Pg. 8: “Surface water sampling is necessary *if there was a known direct release of PFAS to the surface water body or if there is a confirmed or likely PFAS contaminant migration pathway to the surface water via surface runoff...*” Why the qualification? Is it intended to exclude potential PFAS coming to the surface water site via aerial deposition, as noted later in the document?

Pg. 6, top: capitalization on header: “Site investigation goal 1” There are other word/line/character spacing issues, missed superscripts, etc. but I didn’t note them all. I assume there will be a final read-through to catch these little issues.

Pg. 8: “Initial Investigations Action 2” should this be milestone 1 action 2? At times it was difficult to follow the hierarchy of stage/goal/milestone/action.

Pg. 13: “background”—in addition to environmental background there is also human background exposure levels to consider—usually in terms of serum concentration of PFAS.

Pg. 15: “hazard” is described as the “inherent danger of a chemical.” How is this distinct from toxicity? Then a bullet point defines hazard as the presence of PFAS at a site. In Figure 1, hazard is combined with the term stressor. Is it assumed that any presence of PFAS, no matter how low, generates risk?

Pg. 18, top: bad reference not found?? Also pg. 24 step 4 and pg. 28

Fig. 2, maybe include surface water? SW can be a source of irrigation or livestock water.

General comment—I did not see a lot of discussion on separating site-based exposure from non-site, background exposure. I may have missed it, though.

Pg. 48—EJ cross-cutting issue—I thought this was a good summary of the impact of EJ concerns on the whole process. You may want to consider and mention health disparities in population of concern, which are often tied to economic/social inequity.