



417 Walnut Street
Harrisburg, PA 17101
717 255-3252 / 800 225-7224
FAX 717 255-3298
www.pachamber.org

Secretary Patrick McDonnell
Pennsylvania Department of Environmental Protection
Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17101

May 1, 2019

RE: PFAS Action Plan

On behalf of the Pennsylvania Chamber of Business and Industry, the largest, broad-based business advocacy association in the Commonwealth, thank you for opportunity to comment on the PFAS Action Plan.

The PA Chamber has been actively and positively involved throughout the past several decades in working with other stakeholders in helping to frame workable approaches to addressing the water quality and remediation challenges of the state. As the PA Chamber has expressed in our previous comments on various legislation regarding water policy, DEP and EPA proposed rulemakings, and proposals from interstate water basin commissions for the Ohio, Delaware and Susquehanna rivers, the Chamber and its members recognize that protection, development, use and stewardship of the state's water resources is vital to the health and success of the communities, industries and enterprises throughout the state. It is with this perspective that we offer the following comments.

We share the concerns of the Department of Environmental Protection and other stakeholders and hope to be a part of continued discussion and dialogue on solutions. Such a discussion must include a broad array of stakeholders, including those in the private sector who are well-versed and skilled in the technical aspects of water treatment and remediation. As the knowledge base surrounding these emerging contaminants continues to build, it is important that we be judicious with respect to incorporating that growing understanding into any rulemaking or regulatory action.

To date, we have identified several challenges with respect to this issue which merit further discussion and deliberation among stakeholders. These include:

- PFAS are used in many products that we use daily and are considered surfactants with 200+ individual compounds. PFAS are persistent compounds that do not degrade over time. Further, plumes have been shown to move fairly quickly, making sampling and characterization of the plumes difficult to define.
- In some or many cases, there may not be a financially viable responsible party against which to seek recovery of cleanup costs.
- With respect to the removal of PFAS on military installations, it is our understanding that current federal defense budgeting rules obligate the full, multi-year cost of the cleanup to be made available up front, even if the project will be carried out over many years.

- Pennsylvania is one of only two states who do not regulate the construction of private water wells. There is a lack of a regulatory framework to ensure that private water wells are being constructed in a manner that is protective.
- Finally, the development of any cleanup standards or drinking water standards must be based on sound science that provides a high degree of regulatory certainty.

Among the PA Chamber membership are firms who specialize in treatment and cleanup, and these firms stand ready to address this issue. But we must first engage in a constructive dialogue to define measurable, achievable outcomes and select the most efficient, effective path to achieve those outcomes. The meeting today is a good first step, and the PA Chamber and its members hope to continue to engage in these discussions going forward. Thank you for your attention and leadership on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Sunday". The signature is written in a cursive style with a large initial "K" and "S".

Kevin Sunday
Director, Government Affairs