



COMMONWEALTH OF PENNSYLVANIA
OFFICE OF THE GOVERNOR

September 20, 2018

The Honorable Andrew Wheeler
Acting Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Acting Administrator Wheeler:

I write today regarding Per- and Polyfluoroalkyl Substances (PFAS), which continue to be a growing concern among Pennsylvania citizens, drinking water suppliers, and regulators. While I appreciate your agency's decision to hold a community engagement event in Horsham earlier this year, and for EPA's commitment to "take concrete actions" to address PFAS and other emerging contaminants, I urge EPA to move forward quickly with a comprehensive response that will give Pennsylvanians confidence that their water is clean and safe to drink.

Pennsylvania, like many other states, is wrestling with how to address these emerging contaminants and others like it. The Pennsylvania Department of Environmental Protection's Environmental Cleanup Program is currently conducting site investigations, interim response actions, and oversight activities at 11 sites in Pennsylvania contaminated with PFAS. To ensure consistent coordination and engagement at the state level, I recently created a PFAS Action Team, comprised of leaders from the commonwealth's environmental, emergency response, economic development, agriculture, transportation, and health agencies, to identify impacted locations, and to develop and implement action plans to ensure that residents of Pennsylvania have safe water to drink.

While Pennsylvania will continue to do everything within its power to protect the health of residents, PFAS is most effectively addressed through a comprehensive and consistent national regulatory approach. The federal government is equipped with tools and information necessary throughout multiple EPA regulatory programs that states simply do not possess. Failure to address PFAS at the national level will continue to put public health at risk and lead to a patchwork of inconsistent state laws and regulations.

I urge you to address PFAS by setting a protective Maximum Contaminant Level (MCL) for PFOA and PFOS in drinking water expeditiously. It is important that the EPA also assess whether the numeric value of the health advisory level (HAL) should be revised or modified to address groups of PFAS compounds. EPA needs to address inconsistencies in risk values it used in its HAL and the draft toxicological profile for PFOA, PFOS, PFHxS and PFNA recently released by the Agency for Toxic Substances and Disease Registry (ATSDR).

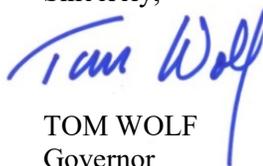
To further limit PFAS exposure, EPA should expand its analytical and regulatory focus beyond drinking water to encompass PFAS reductions across all media. To this end, EPA should:

- Develop rules and/or guidance to prevent PFAS contamination through other means (i.e., consumer products, indoor dust, soil leaching, deposition from air emissions, and wastewater discharges). This includes establishing testing methods for solid waste and waste water.
- Prioritize efforts to determine if controls can be put in place to keep PFAS and other highly fluorinated compounds from entering commerce using the Toxic Substances Control Act (TSCA) and/or other federal authorities.
- Consider listing these compounds as hazardous substances under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and require PFAS reporting under the Toxics Release Inventory.
- Require PFAS reporting under the Toxics Release Inventory Program for air and water to identify where even small amounts of PFAS are used and discharged to the environment and allow states to target specific areas and activities to mitigate PFAS exposure in a more effective and efficient manner.
- Directly engage with states to develop guidance for public water systems with clear recommendations to ensure more consistent response actions and protocols.
- Provide clear direction for consumers to reduce their risk from PFAS in drinking water and other identified exposure pathways.
- Continue to involve stakeholders and industry and evaluate the extent of known and unknown PFAS compounds that are being used.

To further assist my PFAS Action Team, I am formally requesting from EPA a list of companies and locations using and manufacturing these chemicals in Pennsylvania. I have attached the FOIA request to this letter for your reference.

The above actions reflect the vital role that our federal government is equipped and required to play for our citizens and I urge your agency to fulfill its fundamental obligations to the American people and commonwealth residents. The people of Pennsylvania should be confident that the air they breathe and the water they drink is safe. It is imperative that the federal government address this issue by providing appropriate regulatory safety nets to eliminate pathways of PFAS contamination throughout the nation.

Sincerely,



TOM WOLF
Governor

Cc: Pennsylvania's Congressional Delegation