

February 26, 2025

Edgar Chescattie
Director
Bureau of Safe Drinking Water
P.O. Box 8467
Harrisburg, PA 17105-8467

Dear Ed:

The Public Water System Technical Assistance Center (PWS-TAC) Board met on February 20, 2025, to review the Department's proposed regulations for the PFAS and CCR Rules Revisions.

The PWS-TAC Board would like to make the following recommendations concerning these Chapter 109 revisions.

1. The definition of HBWC-Health Based Water Concentration should be changed to delete the phrase "or anticipated."The motion passed: 2 abstentions, 1 "Nay" and 14 "Yays."
2. Keep the compliance dates as presented in the proposed rule to match the dates in the federal rule.
The motion passed by a unanimous "Yay" vote.
3. Remove the heading from paragraph § 109.301(17). If a header is required, change the word "additional" to "revised."
The motion passed by a unanimous "Yay" vote.
4. Modify the text in § 109.701(a)(4)(ii) to replace "learns" with "becomes aware" so that the language reads:
"For Tier 1 public notices for a lead action level exceedance, public water systems must provide a copy of the Tier 1 public notice to the Administrator and the Department as soon as practicable, but no later than 24 hours after the public water system becomes aware of the violation or exceedance."
The motion passed: 3 abstentions and 14 "Yays."
5. Should the Federal Courts, Administration, or EPA vacate the PFAS rule in whole, the PWS-TAC Board encourages the Department to not move forward with this new federal PFAS rule and to maintain the Commonwealth's MCLs for PFOS and PFOA. Should the Federal Courts, Administration, or EPA modify or vacate any portion of the PFAS rule, including the dates, MCLs, trigger levels, or hazard indices, the TAC Board encourages the Department (PADEP) to follow suit.
The motion passed: 6 abstentions and 11 "Yays."

The PWS-TAC Board acknowledges the efforts of the Department in developing this proposed rulemaking and the members look forward to working with the Department as these regulations are finalized.

Sincerely,

Sharon Fillmann

Sharon Fillmann
Chairperson
Public Water System Technical Assistance Center (PWS-TAC) Board

cc: PWS-TAC Board Members