

Warrington



Township

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August 24, 2016

The Honorable Deborah Lee James
Secretary of the Air Force
U.S. Department of the Air Force
1160 Air Force, Pentagon
Washington, DC 20330-1160

The Honorable Regina McCarthy, Administrator.
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

and

The Honorable Ray Mabus
Office of the Secretary of the Navy
1000 Navy Pentagon, Room 4D652
Washington, DC 20350

Re: Urgent Request for Support
PFC Contamination In Our Community

Dear Secretaries James and Mabus and Administrator McCarthy:

We write to you today with a heightened sense of urgency on two matters affecting Warrington, Pennsylvania, arising from the presence of extensive perfluorocarbon ("PFC") contamination in our community. Ignominiously, we have been told that the PFC levels found in our water supply wells are some of the highest levels seen in the country (in one well >2,000 ppt). This request reflects the unanimous resolution of the Warrington Township Board of Supervisors to seek your further assistance on behalf of the over 25,000 full time residents, and thousands of additional business and social visitors served by our local water resources.

We cannot think of a time in the Township's 282 year history that we faced a greater threat to the health and safety of residents in our community than we face today with the discovery of widespread PFC contamination in our public and private water supply wells. The PFCs we are finding in our water have been attributed to the use and release to the environment of PFC-containing firefighting foams at the former Willow Grove Naval Air Station and Joint Reserve Base/Horsham Air Guard Station (the "Base"). We are sure these firefighting foams served important purposes in the Base operations, perhaps even saving the lives of men and women in uniform who served their time nobly at the Base. In writing to you today, we do not wish to diminish the respect we have, and have always had for the men and women in uniform who sacrifice so much to serve our country, or the pride we had as a community hosting important military operations run out of the Base.

But the use of these PFC products has left a terrible legacy in the neighboring host communities, and we struggle to understand and come to grips with the long-term impacts their use has had, and continues to have on the residents here. It is this struggle that prompts us to write to you today seeking your further help and support in two important ways.

The Need To Sample More Private Water Wells, Sooner

While working with EPA Region III ("EPA") and the Air National Guard ("ANG") and its Air Force support personnel we have been able to begin to take steps to remove PFCs from our *public* water supply, many of our residents still use private wells in areas projected to be downgradient of the Base, or recharged from groundwater that is partially recharged from surface water that also has been impacted by PFCs migrating from the Base. Our public system serves most, but not all of the Township residents. Fully 1,000+ homes still rely on their own private wells, and at least 30 of those so far have been tested by EPA and found to contain PFCs well above the old and new EPA action levels (now expressed as a Health Advisory Levels or "HALs"). And, the PFCs in groundwater and surface water continue to move away from the Base, expanding the water resources being impaired and potentially affecting more and more homes that use private wells as their sole source of water supply. This situation should be acceptable to no one.

While EPA and the ANG have a program to sample *some* private wells, there are many more that need to be sampled, but have not been. While we have directed these residents to EPA and ANG, we continue to receive reports from residents that their wells still have not been sampled, even though other wells in their neighborhoods have been sampled and found to contain PFCs. Many of the residents with private water wells do not currently have ready access to public water, although we are working with ANG to extend water lines to neighborhoods where the groundwater is now impaired, as ANG identifies them to us. But these projects can take many months, even years to get water lines extended and residents connected. In the meantime, residents face tremendous uncertainty in their water use, and grow increasingly anxious as more and more information becomes publicly accessible reporting potential health effects of long-term PFC exposure.

So, we need your agencies to work together to more expeditiously get all of the residential wells sampled within a reasonable radius of the Base, and certainly in the Eastern area of Warrington Township where the impacts have been greatest. [Attached is a list of residential well owners in this area in need of sampling] As well, we do not believe EPA or ANG should remove streets or neighborhoods from concern based on a single sampling event, since (a) we know these contaminants are on the move, and (b) the shut-down of large public water supply well pump centers undoubtedly has affected the hydrologic balance and changed the groundwater movement dynamic (how it has changed is a question for experts, but in Eastern portion of Warrington Township alone we have shut down wells that were removing nearly 1 MGD). For this reason, private wells that may have had PFCs <70 ppt three or six months ago may have a different result today.

We appreciate the logistical problems of sampling hundreds of private wells, however you are large, sophisticated agencies and the logistics of this problem, compared to others you face, should be eminently manageable. Our public is increasingly anxious to have this sampling done, is growing mistrustful of government as these sampling delays continue, and we must act as their voice and do so now. We implore you to commit the resources needed to get these private wells sampled a first time and then to establish a program to re-sample them with a level of frequency designed to detect changes.

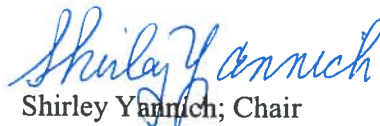
Blood Testing

The simple truth is, many of our residents, including members of this Board of Supervisors, are likely to have been exposed to PFCs through their consumption of or contact with water from PFC-containing public and private water supply wells. For some residents, the exposure continues. Respectfully, our public officials (here the Air Force and Navy) responsible for the release of these PFCs where they were taken up by your fellow citizens through daily water use must now take responsibility to investigate and assess the human impacts. The assessment process begins with blood testing of the affected population. Considerable time, effort and money have been committed to assessing the environmental impacts, and it is appropriate that you do so. But the human exposure should not be a secondary consideration.

The collection of baseline data must start somewhere. In the phraseology of the toxicologists who have spoken at our public meetings, there is a complete exposure pathway and there is an exposed population. It is now incumbent upon the responsible agencies to begin a program of blood testing to establish a baseline for medical monitoring purposes, so medical professionals can begin to follow the exposed residents with actual exposure data collected close in time to the period of exposure. To forego such a testing program will be to miss an important opportunity to monitor real life exposure to humans. Please help our residents by initiating a program for blood testing. It is a modest but important and responsible step. While our groundwater resources are important, human lives matter and in this instance they require no less attention.

We thank you each for your consideration of this request and your continuing support of our efforts to secure our water supply for current use and future generations. We will continue to collaborate with all of the organizations, agencies and departments involved, including yours, in the investigation and remediation of PFCs in our community.

Sincerely,



Shirley Yannich; Chair
Board of Supervisors, Warrington Township

With,

Carol T. Baker; Vice Chair
Matthew W. Hallowell, Sr.; Member
Millie A. Seliga; Member
Fred R. Gaines; Member

Attachment

cc: Terry Clemons, Township Solicitor