



# Citizens for a Healthy Bay

June 10, 2019

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Re: Draft Interim Recommendations for Addressing Groundwater Contaminated with PFOA and PFOS (Docket ID No. EPA-HQ-OLEM-2019-0229)

Dear Mr. Foster,

Thank you for providing the opportunity to review and comment on the Draft Interim Recommendations for Addressing Groundwater Contaminated with Perfluorooctanoic Acid (PFOA) and Perfluorooctanesulfonic Acid (PFOS).

Citizens for a Healthy Bay (CHB) is a 29-year-old organization whose mission is to represent and engage people in the cleanup, restoration, and protection of Commencement Bay, its surrounding waters and natural habitat. We are a 501(c)3 nonprofit providing practical, solutions-based environmental leadership in south Puget Sound. We work side-by-side with residents, businesses, and government to prevent and mitigate pollution and to make our community healthier and more vibrant.

Staff and expert members of CHB's Policy and Technical Advisory Committee have reviewed the draft interim recommendations. Our comments are outlined below.

## Background

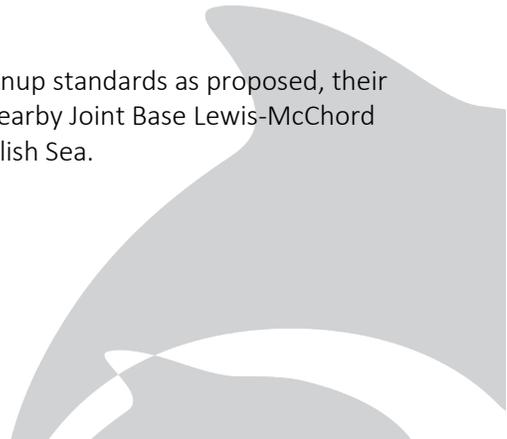
The Environmental Protection Agency (EPA) has released draft interim recommendations for cleanup standards when an area is found to be contaminated with PFOA and PFOS. PFOA and PFOS are extremely persistent environmental contaminants that are commonly found at military bases as they are primary constituents of firefighting materials. Exposure pathways include drinking contaminated water and eating contaminated foods such as fish and shellfish. Exposure to these types of contaminants can cause cancer of the kidneys and testicles, thyroid disease, cardiac disease, inflammatory bowel disease, reproductive complications, and developmental delays and defects.<sup>1</sup>

CHB is extremely concerned with the EPA's weakened cleanup standards as proposed, their potential impacts to public health, especially around the nearby Joint Base Lewis-McChord (JBLM), and the environmental impacts to the southern Salish Sea.

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These draft interim recommendations show that the entirety of the “Action Determination” and “Removal Management Levels” sections were eliminated. Removing these sections abolishes the EPA’s ability to enact swift responses when drinking water supplies are found to be contaminated with PFOS and PFOA. Additionally, the draft recommendations include a new sentence stating, “In situations where groundwater is being used for drinking water, EPA expects that responsible parties will address levels of PFOA and/or PFOA over 70 ppt [parts per trillion].” The language of this sentence removes any authority from EPA to force responsible parties to begin cleanup activities, and completely ignores groundwater sources found to have PFOA and/or PFOA over 70 ppt.

*CHB recommends the Action Determination and Removal Management Levels sections should be added back into the standards, with specific language about how and when responsible parties will address PFOA and/or PFOS-contaminated drinking water and groundwater sources.*

JBLM has already had to shut down three of its drinking-water wells due to PFOS and PFOA contamination.<sup>2</sup> The aquifer under JBLM runs into the Chambers-Clover Creek watershed, which ultimately outlets into the Tacoma Narrows, which flushes with the tide to both the north and south.<sup>3</sup> Well 10C, owned by Tacoma Public Utilities and located within the Chambers-Clover Creek watershed, was also shut down due to PFOS and PFOA contamination.<sup>4</sup> There are over 13,000 active wells in this watershed – many of which are down-gradient from JBLM, and at the proper depth, have the potential to be contaminated with PFOS and PFOA.<sup>5</sup> The groundwater in this watershed will outlet to the Salish Sea, where federally-listed salmon and marine mammals including Southern Resident Killer Whales swim, forage, and migrate – and are at risk for accumulating these contaminants in their tissues. Our community recreates in these waters, and the Puyallup, Nisqually, Squaxin Island, and other indigenous peoples fish, hold ceremonial gatherings and practice their spirituality in these waters.

Weakening the cleanup standards for PFOA and PFAS is an environmental injustice. Much of the community surrounding JBLM and into the Chambers-Clover Creek watershed rate 10 on the Environmental Health Disparities scale – meaning they experience worsened health outcomes because of where they live. These communities live closest to hazardous waste treatment, storage, and disposal facilities and neighbor a major superfund site. These are also commonly communities of color and those living under the federal poverty level, including members from the Puyallup Tribe of Indians.<sup>6</sup> Weakening standards for addressing groundwater and drinking water contaminated with PFOA and PFOS will only further harm these communities, especially given that our nearby drinking water and groundwater supplies have already been found to be contaminated.

Please contact me if there are questions regarding my comments. Thank you for the opportunity to provide feedback on the Draft Interim Recommendations for Addressing Groundwater Contaminated with PFOA and PFOS.

Sincerely,



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1. National Center for Environmental Health. (2017). *An Overview of Perfluoroalkyl and Polyfluoroalkyl Substances and Interim Guidance for Clinicians Responding to Patient Exposure Concerns*. Author.
2. Lynn, A. “3 JBLM wells shut after unacceptable levels of chemicals found in the water.” *Tacoma News Tribune* [Tacoma, WA]. March 2, 2017. Accessed from <https://www.thenewstribune.com/news/local/military/article136098683.html> on June 6, 2019.
3. Savoca, M.E., et al. (2010). *Hydrogeologic Framework, Groundwater Movement, and Water Budget in the Chambers-Clover Creek Watershed and Vicinity, Pierce County, Washington Scientific Investigations Report 2010-5055*. United States Geological Survey.
4. Tacoma-Pierce County Health Department. (n.d.). *PFAS and Drinking Water*. Accessed from <https://www.tpchd.org/healthy-people/drinking-water/pfos-pfoa-and-your-health> on June 6, 2019.
5. Washington Department of Ecology. (n.d.). *Washington State Well Report Viewer*. Accessed from <https://fortress.wa.gov/ecy/wellconstruction/map/WCLSWebMap/default.aspx> on June 6, 2019.
6. Washington State Department of Health. (n.d.). *Washington Environmental Health Disparities Map*. Accessed from <https://fortress.wa.gov/doh/wtn/WTNIBL/> on June 6, 2019.