

NEWLIN TOWNSHIP BOARD OF SUPERVISORS

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via e-mail

April 23, 2025

Mr. David Greaves
Remedial Project Manager
U.S. EPA Region 3
1600 John F. Kennedy Boulevard (Mail Code: 35021)
Philadelphia, PA 19103

**Re: Strasburg Landfill Superfund site
PFAS contamination – Hybrid Alternative**

Dear David:

Thanks for your presentation at EPA's April 12, 2025 public meeting at our maintenance shed. You and your team did a fine job in reviewing EPA's Proposed Plan to address the problem of PFAS contamination of residential wells down-gradient from the Strasburg Landfill Superfund site.

At that meeting, you identified Public Waterline ["public water"] as EPA's preferred alternative, and estimated that the connections to a public water supply could be completed in the summer of 2028 (three years after EPA's expected issuance of a final Record of Decision ("ROD") on this matter). However, you identified Aqua Pennsylvania ("Aqua") as the most likely source of public water, and advised that Aqua (i) is not currently in compliance with EPA's PFAS standards and (ii) has until April 2029 to come into compliance. The Proposed Plan contemplates that affected residents would continue to receive pitcher filters or bottled water until the later of the completion of the public water connections or Aqua's PFAS compliance.

We wanted to emphasize a point raised by Supervisor Bob Pearson at the public meeting:

Why make residents wait four years before they can shower with safe water?

It is becoming clear that ingestion is not the sole pathway for dangerous PFAS exposure¹. Therefore, for people who bathe, neither filter pitchers nor bottled water represent a safe interim

¹ According to a 2024 study published in Environment International, dermal contact results in a significant percentage of PFOA and PFOS being either retained in the skin or absorbed into the bloodstream.

PFAS solution, either in the short term (pending POETS² installation) or the long term (pending public water connection and Aqua's PFAS compliance).

We urge EPA to issue a ROD that selects the following hybrid alternative:

1. **Complete all POETS installations - for temporary operation – at the earliest practicable date.**
2. **Complete all public water connections no later than the date of Aqua's anticipated compliance with EPA's PFAS standards.**
3. **Public water supply to commence, and POETS to be deactivated, upon the later of (x) the completion of public water connections or (y) actual Aqua PFAS compliance.**

The hybrid approach will actually cost less than the amount you have estimated for the public water alternative:

- The PRAP estimates the present worth of the public water alternative at **\$10,136,498**; but that assumes the installation of 4.12 miles of distribution lines in public roadway rights of way, with fire hydrants installed every 600 feet. At the April 2 public meeting, a representative of Barry Oliff confirmed that Mr. Oliff is prepared to grant Aqua an easement across his property at no cost. The Oliff property extends across virtually the entire distance from the nearest current Aqua distribution line to Laurel Road. We estimate that this would reduce the required distance of the new public water distribution lines to less than 1.7 miles, very little of which would require fire hydrants. That should reduce the present worth of the public water alternative to **\$5,233,487**^{3,4}.
- EPA's published Proposed Remedial Action Plan for Interim Record of Decision Amendment (the "PRAP") for the Strasburg landfill estimates the present worth of the POETS alternative to be **\$6,122,841**; but that includes the present value of 30 years of operation and maintenance costs (estimated at \$395,380 - \$475,065 per year). If the POETS alternative only operates for three years after installation, the present worth of POETS would be **\$2,249,402**.

² "POETS" is EPA's acronym for its Alternative 2: Point of Entry Treatment System. You estimated that POETS could be installed at affected residences within one year after issuance of the ROD.

³ PRAP Appendix B (a cost estimate for the public water alternative) shows a "Main Water Line Installation and Oversight" (referred to herein as "Installation") cost of \$8,931,584, a "TOTAL" cost of \$11,587,588 and a "Present Worth Cost" of \$10,136,498. Those latter two amounts are sufficiently close that it appears EPA only discounted the Installation cost for a single year (at its selected 7% discount rate), implying an Installation cost Present Worth of \$8,347,375. Applying a ratio of 1.7/4.12 to that number (to reflect the shorter installation distance discussed above) yields a revised Installation Present Worth of \$3,444,264. The difference between those two Installation Present Worth numbers (\$8,347,375 - \$3,444,264 = \$4,903,011) reduces the total "Present Worth Cost" for the public water alternative from \$10,136,498 to \$5,233,487.

⁴ This amount should be further reduced by the savings resulting from fewer fire hydrants per installed mile of distribution line.

- So: Present worth of the hybrid alternative:

POETS: \$2,249,402

Public Water: \$5,233,487

Total: \$7,482,889

That's more than \$2,600,000 below your estimate of the present worth of the public water alternative.

We also urge EPA to accelerate the timetable for implementation, whichever alternative it ultimately selects: EPA has been aware of the Strasburg Landfill PFAS problem since mid-2023. Our residents have been living with the inconvenience and danger of bottled water or filter pitchers since early 2024. Another year (for POETS) would be disappointing; another four years (for public water without POETS) would be outrageous!

Please email or call me if you would like to discuss.

Very truly yours,

Newlin Township Board of Supervisors

By: 

James H. Cornell, Chair

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