



**Government and Community Relations**  
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November 9, 2021

Benner Township Supervisors  
1224 Buffalo Run Road  
Bellefonte, PA 16823

Dear Supervisors:

Penn State has for some time been working diligently and cooperatively with the Pennsylvania Department of Environmental Protection's (PA DEP) ongoing PFAS investigation. As recently discussed at the Nov. 1, 2021, meeting of the Benner Township Supervisors, Penn State has reviewed the Benner Township Due Diligence Summary Report commissioned by the PA DEP related to the family of substances known as PFAS, of which PFOS and PFOA are part. As indicated in the report, additional soil and water sampling is needed not only on Airport property but also at properties along High Tech Rd. In coordination with PA DEP's investigation, Penn State has plans to conduct additional soil analysis, and it is possible that further investigation may be required by PA DEP depending on the results of the currently planned additional sampling. It should be noted that the investigation remains under the lead of PA DEP, and the investigation is ongoing.

PFAS contamination is a complex issue. It includes a family of thousands of chemicals manufactured and in use since the 1940s. Although some PFAS compounds have been phased out, many others are still being used today. These chemicals are ubiquitous in our everyday lives, and widely used as part of many household, commercial and industrial products -- including carpeting, cookware, clothing and food packaging. This family of thousands of chemicals also has been part of manufacturing and industrial processes, such as electronics production, metal coatings, chemical manufacturing and oil and gas, as well as emergency fire-fighting materials. Knowing that a number of previous and current industries in the region may have handled or used PFAS in their various manufacturing processes, it is understandable that the community is eager to determine all of the potential sources of these chemicals.

Like all commercial airports, University Park Airport is required by the Federal Aviation Administration (FAA) to use fire-fighting foams (AFFF: Aqueous Film Forming Foam) that meet a certain military specification. In October 2021, the FAA issued an alert stating that this military specification no longer requires the use of fluorinated chemicals. However, there are currently no fluorine-free foams available that meet the required military specification. As a result, the airport has no choice but to continue to use a fluorinated fire-fighting foam in order to comply with FAA requirements, including for periodic required testing of aircraft rescue and fire-

fighting vehicles and fire suppression operating systems. The airport is mandated to store and use these foams to maintain its certification from the FAA.

At all times, the airport has acted in strict compliance with the requirements of the FAA and has taken steps over the years to minimize, if not eliminate, any discharge of PFAS onto the ground. For example, training activities at the airport no longer include discharge of foam; existing supplies of AFFF are stored with a secondary containment system to minimize the risk of a spill or leak; and the airport uses a separate storage container to discharge AFFF for testing to ensure the functionality of the foam distribution system on vehicles. Offsite disposal is conducted by a third-party vendor in coordination with Penn State's Environmental Health and Safety office.

Despite actions in the last three years by the federal Environmental Protection Agency (EPA) leading to the issuance of an interim recommendation of 70 ppt (parts per trillion) as the preliminary remediation goal for contaminated groundwater that is or could be a source of drinking water, PFAS currently remain unregulated in drinking water systems. Likewise, and to date, no PFAS compound has been designated a "hazardous substance" or "hazardous waste" by the EPA or the PA DEP. Both EPA and PA DEP have action teams working on PFAS issues, and additional regulatory and/or legislative action is expected, either federally or in Pennsylvania, or both. EPA recently (this month) published a [PFAS Strategic Roadmap](#) outlining their integrated approach to addressing PFAS contamination throughout the country.

Penn State has been cooperating with all PA DEP requests for information and testing. The PA DEP has posted information related to this specific investigation on its website at [Benner Township HSCA Investigation \(pa.gov\)](#). There are additional informative links, such as ["Introduction to Per and Poly Fluoroalkyl Substances \(PFAS\)"](#) at this site.

During the Nov. 1 township meeting, a number of questions were raised, and we'd like to take this opportunity to address some of these topics:

- **Disruption of soil through airport construction/excavation for approved projects**

Soil is still being excavated at the site, and all excess soil is staying on site. Coordination with PA DEP occurred prior to the beginning of construction at the airport. For the Taxiway project, initial shallow soil sampling was conducted and results in the area were below the proposed PA DEP direct contact medium specific concentrations for PFOA or PFOS. Additional soil sampling will occur in the next phase of the taxiway project prior to its start.

- **Water runoff from the airport**

All construction projects are required by PA DEP to develop "Erosion and Sediment Control (E&SC) Plans and Post Construction Stormwater Management Plans" that specifically address runoff from a project site. Both the ARFF vehicles Building and the Taxiway projects have approved E&SC Plans that outline specific requirements put in place to control runoff from the site. The Centre County Conservation District monitors and inspects these active construction sites.

- **Discharge of fire-fighting foam on airport property**

For approximately the past 15 years, the University Park Airport's standard procedures for testing have not included discharge of fire-fighting materials onto the ground. Testing activities occurred primarily on the paved deicing apron where foam was collected and stored in a storage tank for offsite disposal. From 2006-2018, this material went to the Bellefonte wastewater treatment plant.

The Airport is currently following system testing recommendations from the FAA, specifically Cert Alert 21-01, by using a separate storage container to discharge AFFF for testing to ensure the functionality of the fire-fighting vehicles. Offsite disposal is conducted by a third party in coordination with Penn State's Environmental Health and Safety office.

On May 26, 2021, as required by the FAA, a full-scale triennial exercise of the Airport Emergency Plan was held on the deicing apron. No fire-fighting foam (AFFF) was used. A live burn mobile simulator from the West Virginia University Fire Training Academy was on-site to provide fire training and to support this full-scale exercise. The mobile simulator uses propane as the fuel for the fire. The propane fires are extinguished with water discharged from the airport's ARFF vehicles.

- **Sludge previously spread on fields from the Bellefonte Wastewater Treatment Plant**

This is a matter for the Environmental Protection Agency to investigate and EPA officials are looking into the issue. [Part of EPA's plan related to PFAS](#) includes a risk assessment for PFOA and PFOS in biosolids.

- **Removing PFAS that flows into wastewater treatment plants**

Currently, wastewater treatment plants are not equipped to completely remove PFAS from wastewater. PFAS are very resistant to biological treatment and additional regulatory guidance is needed.

- **Water testing for residents**

For information and guidance on water testing for all contaminants, please visit [PA DEP's website](#) providing guidance for private well testing.

For information on water testing for PFAS, please contact the [PA DEP's Northcentral Regional Office](#).

- **More information on PFAS**

Visit EPA's website at <https://www.epa.gov/pfas/our-current-understanding-human-health-and-environmental-risks-pfas>

Penn State remains committed to the protection of the environment and the health and safety of our community. The University will continue to work diligently and cooperatively with the PA

DEP and the EPA. We look forward to further insights and guidance from both the Commonwealth and the federal government in this evolving area.

Sincerely,

A handwritten signature in cursive script that reads "Charima Young". The signature is written in black ink and is positioned below the word "Sincerely,".

Charima Young  
Director of Local and Community Relations