

# Borough Of Ambler

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September 27, 2018

Mr. Paul Leonard, Manager  
Upper Dublin Township  
801 Loch Alsh Avenue  
Fort Washington, PA 19034

Dear Paul,

Thank you for your email on September 24, 2018 inquiring as to Ambler's position and plan regarding the presence of PFAS in water supply. As stated in our September 12, 2018 Notice (enclosed), follow-up sampling of all Ambler sources and storage tanks is complete and results have been made available. These results continue to be significantly below the EPA's Lifetime Health Advisory of 70 ppt and in many cases, results are lower than those from Ambler's 2016 testing. Further, Ambler has evaluated its results against the recommended health-based standards in New Jersey and drinking water notification levels in California (both states are using levels of 14 ppt for PFOA and 13 ppt for PFOS). All Ambler sources and tanks are below these levels. Based on this evaluation, Ambler Borough's position is that all sources are operating at levels well below the EPA Lifetime Health Advisory and also below more conservative recommended levels in states where additional analysis and evaluation of data have occurred. Ambler Borough will continue to monitor these compounds, with all sources and storage tanks scheduled for annual sampling.

Your September 24, 2018 email also included comments from a concerned resident which indicate wells that service Upper Dublin High School and Fort Washington Elementary School have combined PFOS/PFOA of over 30 ppt. We would like to clarify that this information is inaccurate, and the highest combined concentration of any Ambler source is 17.4 ppt. The accuracy of our results are further supported by the results of testing released by the School District, which indicate the levels at Upper Dublin High School and Fort Washington Elementary School were found to be in the range of 15 ppt prior to installation of GAC filters. I'm sure you share our concern that, because of justified community concerns surrounding this issue, it is imperative that all shared information is accurate.

It is also important to note that any pending legislation or regulation related to PFAS, if adopted, would be an unfunded mandate, which would require water suppliers to place the burden of costs associated with addressing such regulation on its rate payers. Very preliminary estimates of these costs are greater than \$5 million in Ambler. Although public health will always be the highest priority, financial impacts to our customers cannot be ignored, which is why we continue to rely on our regulators responsible for establishing reliable health-based standards for chemicals that exist in our water supply. We are encouraged to learn that Governor Wolf, on September 19, 2018, signed an Executive Order establishing a multi-agency PFAS action team

to address concerns surrounding PFAS. According to the Order, the team is expected to develop a comprehensive response to PFAS, including implementation of a "scientifically-sound, thoughtful, holistic, and proactive approach to addressing this emerging contaminant."

Ambler Borough will continue to be engaged and in compliance with any recommendations and requirements from our regulators. We will, as always, work with our federal and state regulators, as well as our elected officials, to continue providing the highest quality drinking water to all customers.

Should you have any questions or require additional information, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mary Aversa', with a long, sweeping underline.

Mary Aversa  
Borough Manager

**UPDATED SEPTEMBER 12, 2018**  
**AMBLER BOROUGH WATER DEPARTMENT**  
**INFORMATION REGARDING PFOA AND PFOS IN WATER SUPPLY**

Ambler Borough Water Department continues to remain active and updated regarding issues related to polyfluoroalkyl substances (PFAS). In a previous Notice issued in July 2018, the Borough indicated that follow-up sampling of all of its sources and storage tanks would occur in August 2018. The scheduled sampling was completed on August 16, 2018, and results were recently received from the laboratory. The table below includes the most recent sampling results, as well as the October 2016 sampling results:

Well No. or Location	PFOA (ppt) 2016	PFOA (ppt) 2018	PFOS (ppt) 2016*	PFOS (ppt) 2018*	PFOA+PFOS 2018	% of 70 ppt EPA Health Advisory 2018 PFOS+PFOA
2	13	6.2	ND (<10)	7.8	14.0	20.0%
4	9	9.1	ND (<10)	8.3	17.4	24.9%
6	9	ND	ND (<10)	7.0	7.0	10.0%
7	8	ND	ND (<10)	7.0	7.0	10.0%
8	4	2.6	ND (<10)	5.9	8.5	12.1%
9	10	8.7	ND (<10)	7.3	16.0	22.9%
11	8	8.5	ND (<10)	6.8	15.3	21.9%
12	7	7.7	ND (<10)	5.5	13.2	18.9%
14	6	6.7	ND (<10)	5.5	12.2	17.4%
Whitemarsh WTP Raw	10	8.1	ND (<10)	6.9	15.0	21.4%
Whitemarsh WTP Treated	**	7.6	**	4.0	11.6	16.6%
<b>Storage Tanks</b>						
Loch Alsh Tank	12	9.9	ND (<10)	6.8	16.7	23.9%
Broad Axe Tank	7	10.1	ND (<10)	6.8	16.9	24.1%
Houston Road Tank	7	7.4	ND (<10)	6.1	13.5	19.3%

\* Method Reporting Limit (MRL) for PFOS in 2016 sampling was 10 ppt; MRL for PFOS in 2018 sampling was 1.9 ppt  
\*\* Whitemarsh WTP Treated not sampled in 2016; only raw water was sampled

Notes:

ppt=parts per trillion

ND=Not Detected

2016 samples collected on October 31, 2016 and analyzed by Eurofins QC - Lancaster, PA

2018 samples collected on August 16, 2018 and analyzed by Eurofins Eaton - Monrovia, CA

MRL (Method Reporting Limit):

PFOA (2016 sampling): 2 ppt

PFOS (2016 sampling): 10 ppt\*

PFOA (2018 sampling): 2.0 ppt

PFOS (2018 sampling): 1.9 ppt

\* Higher MRL for this compound in 2016 resulted in ND results for PFOS for all samples

As many are aware, the U.S. Environmental Protection Agency (USEPA) issued a Lifetime Health Advisory of 70 parts per trillion (ppt) for the combined concentration of PFOS and PFOA in May 2016. The concentrations of these compounds in all of Ambler's sources and storage tanks continue to be significantly below this Lifetime Health Advisory. The Pennsylvania Department of Environmental Protection (PADEP) adopts the drinking water regulatory standards, health advisories, and guidelines of the USEPA. These compounds remain unregulated in drinking water.

Scientific study, research, and data continue to evolve, not only for these two contaminants, but for the full family of PFAS. The current USEPA Lifetime Health Advisory is based on the best science available to identify the combined concentration of PFOA and PFOS in drinking water below which adverse health effects are not anticipated to occur over a lifetime of exposure for the most sensitive members of the population.

The results above generally indicate that the concentrations of these compounds have not increased since sampling in 2016 and, in many cases, have decreased. Ambler Borough will continue to monitor the concentrations of these compounds, with all sources and storage tanks scheduled for annual sampling.

Ambler Borough remains committed to providing the highest quality drinking water to all customers. The Borough will continue to be engaged and in compliance with any recommendations and requirements from our federal and state regulators. The Borough's water continues to be in compliance with all regulations of the Safe Drinking Water Act.

Additional information regarding PFAS can be found at the following websites:

<https://www.epa.gov/pfas>

<https://www.atsdr.cdc.gov/pfas/index.html>

<https://www.dep.pa.gov/pfcs>