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## United States Senate

COMMITTEE ON ENVIRONMENT AND PUBLIC WORKS

WASHINGTON, DC 20510-6175

RICHARD M. RUSSELL, MAJORITY STAFF DIRECTOR  
MARY FRANCES REPKO, MINORITY STAFF DIRECTOR

May 21, 2020

The Honorable Andrew Wheeler  
Administrator  
U.S. Environmental Protection Agency (EPA)  
1301 Constitution Ave. NW  
Washington, DC 20460

Dear Administrator Wheeler,

We write to request information about EPA's plan to address per- and polyfluoroalkyl substances (PFAS) contamination at Superfund sites. We are particularly interested in the 180 Superfund sites EPA has identified as containing PFAS that were provided to the Senate Environment and Public Works (EPW) Committee in responses to questions posed at a 2019 hearing.<sup>1</sup> While it is helpful to know where these substances have been found, EPA did not include information as to which specific PFAS were found at each site, or the amount of those chemicals present. This information is critical to the continued response to PFAS contamination, as well as to efforts to ensure the public health and safety of the 53 million Americans that live within three miles of a Superfund site.<sup>2</sup>

As part of Assistant Administrator David Ross's response to questions for the record from Ranking Member Carper during the EPW Committee's March 2019 hearing entitled "*Examining the federal response to the risks associated with per- and polyfluoroalkyl substances (PFAS)*," EPA identified and shared a list of 180 Superfund sites where PFAS have been detected. This response provided no information as to the level of contamination that was identified at each site. The 180 sites have been plotted on a map, available as an attachment to this document or by following the link to the interactive map,<sup>3</sup> and include Superfund sites in 33 states and the District of Columbia.

In the Interim Recommendations for Addressing Groundwater Contaminated with PFOA and PFOS submitted to OMB on August 31, 2018,<sup>4</sup> EPA sought to establish a screening level of 40

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<sup>1</sup> Our request comes as a direct response to information Mr. Ross, Assistant Administrator of the Office of Water, provided as part of his answers to Questions for the Record for the Senate Committee on Environment and Public Works Hearing entitled, "*Examining the federal response to the risks associated with per- and polyfluoroalkyl substances (PFAS)*" on March 28, 2019.

<sup>2</sup> <https://www.epa.gov/sites/production/files/2015-09/documents/webpopulationrsuperfundsites9.28.15.pdf>

<sup>3</sup> Link to map of Superfund Sites Identified by EPA to have PFAS Contamination:  
<https://www.epw.senate.gov/public/index.cfm?p=Superfund-Sites-Identified-by-EPA-to-have-PFAS-Contamination>

<sup>4</sup> <https://www.regulations.gov/document?D=EPA-HQ-OLEM-2019-0229-0003>

parts per trillion (ppt). At that time, EPA recommended that any detection of PFAS at or above that level warranted further investigation.

Additionally, Mr. Ross's response states that for Superfund sites where the presence of PFAS exceeds the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) screening levels of 40 ppt, "the site will be monitored along with other contaminants throughout the remediation process." However, Mr. Ross did not indicate whether the agency would ensure the remediation of current or potential sources of drinking water contamination at these sites to bring them into compliance with EPA's drinking water health advisory, which recommends an individual or combined standard of 70 ppt.<sup>5</sup>

Mr. Ross was also asked whether EPA had tested all Superfund sites for the presence of PFAS. Mr. Ross answered that at this time "the agency has only tested Superfund sites where there is reason to believe PFAS chemicals might be present," and that testing "generally occurs as part of the site investigation, a five-year review, or as part of remedy optimization." Given the widespread use and persistent nature of PFAS, additional efforts to test for PFAS at Superfund sites may be warranted.

So that we can further understand the information EPA has collected regarding the presence of PFAS contamination at Superfund sites, as well as the agency's plan to address it, we ask that you provide us with responses to the following questions and requests for information by June 19<sup>th</sup>, 2020.

1. Please identify all Superfund sites that have been found to contain PFAS, along with a list of each specific PFAS detected and the level (in ppt) at which it was found. If comprehensive monitoring at all Superfund sites has not been undertaken in a manner that obtained this information, please describe EPA's plans for doing so along with a timeline for its completion.
2. Please provide information as to how the presence of PFAS identified during the preliminary assessment or site inspection is incorporated into EPA's Hazard Ranking System. Does it contribute to the overall score necessary for a site to receive listing on the National Priorities List, and if so, how? Would this process be expected to change for PFAS designated to be hazardous substances under CERCLA, and if so, how?
3. Please provide information as to how the Remedial Investigation process is used to determine the nature and extent of PFAS contamination at a Superfund site, as well as how that information is shared with the public during the Remedial Investigation and Feasibility Study phase of the Superfund cleanup process. Would this process be expected to change for PFAS designated to be hazardous substances under CERCLA, and if so, how?

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<sup>5</sup> <https://www.regulations.gov/document?D=EPA-HQ-OLEM-2019-0229-0003>

4. Please provide a list of Superfund sites for which the Record of Decision issued by the agency addressed PFAS contamination, and a description of how it was addressed.
5. For Superfund sites where PFAS are known to be present, but a plan for their removal or remediation was not included in the original Record of Decision, please provide information as to whether the agency plans to reopen those cleanup agreements and amend them to include the removal or remediation of PFAS at Superfund sites. Would this process be expected to change for PFAS designated to be hazardous substances under CERCLA, and if so, how?
6. Under CERCLA, please describe whether EPA has the authority to:
  - a. Require the cleanup of PFOS or PFOA if they are present at levels higher than 70 ppt at a Superfund site.
  - b. Require the cleanup of PFOS or PFOA if there has been, or could be, a release of PFOS or PFOA from the site.
  - c. Recover response costs for the remediation of PFOS and PFOA from the potentially responsible party if such costs have been or will be incurred by the government or other parties.
  - d. Use EPA's de minimis settlement authority or other tools to compel or facilitate settlements with potentially responsible parties to address contamination by PFOA or PFOS.

For each of a-d above, please also describe how EPA's authority would change if PFOS and PFOA are designated as hazardous substances under CERCLA.

Thank you for your prompt attention to this matter. If you or members of your staff have any questions regarding these requests, please ask the appropriate members of your staff to contact Michal Freedhoff or Annie D'Amato of the EPW Committee staff at 202-224-8832.

Sincerely yours,



Thomas R. Carper  
Ranking Member



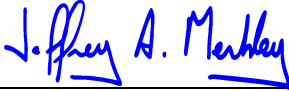
Benjamin L. Cardin  
United States Senator



Bernard Sanders  
United States Senator




Sheldon Whitehouse  
United States Senator



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Jeffrey A. Merkley  
United States Senator



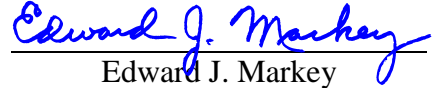
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Kirsten Gillibrand  
United States Senator



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Cory A. Booker  
United States Senator



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Edward J. Markey  
United States Senator



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Tammy Duckworth  
United States Senator



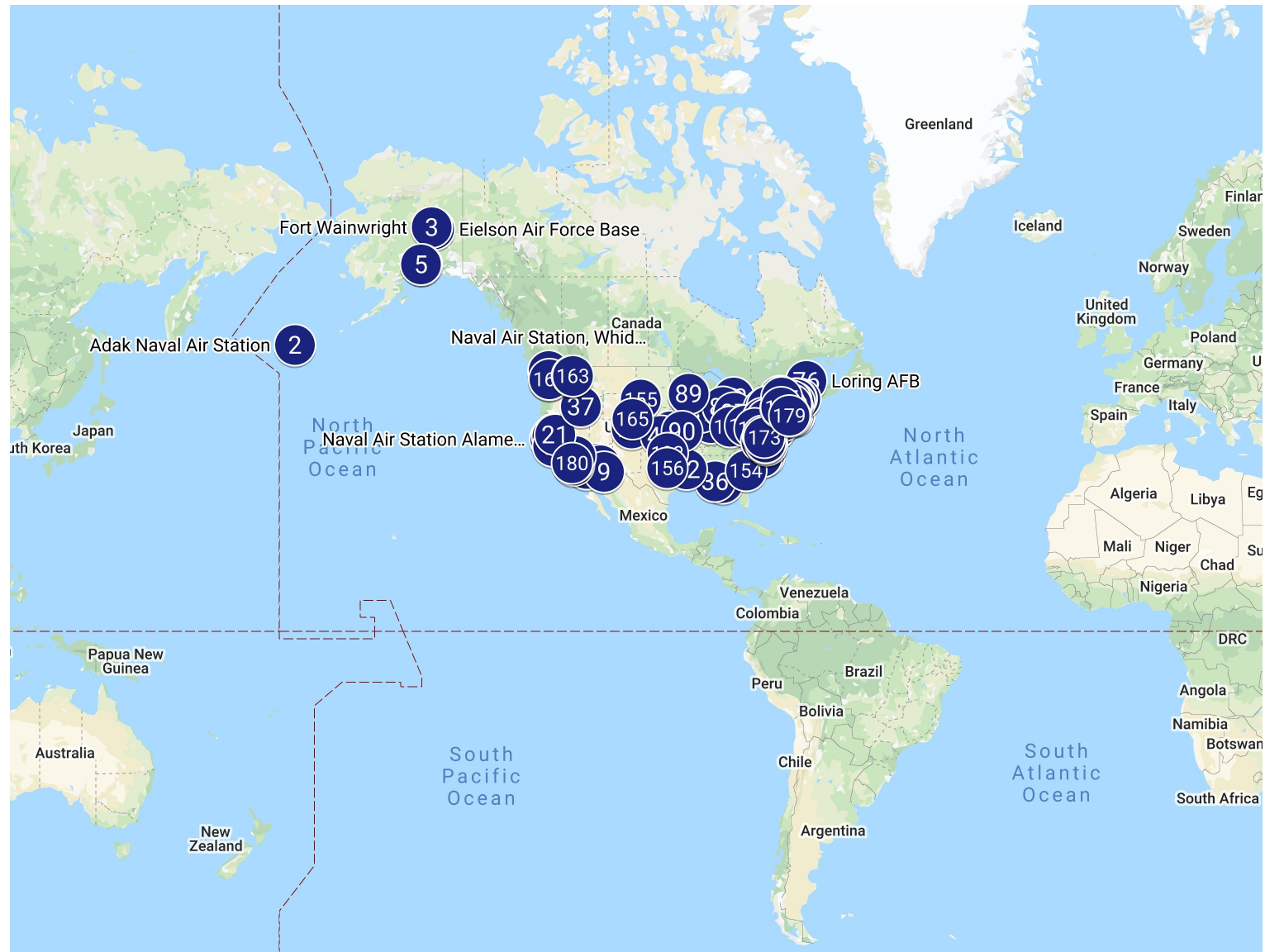
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Chris Van Hollen  
United States Senator

# Superfund Sites Identified by EPA to have PFAS Contamination

## Sites

- 1 Eielson Air Force Base
- 2 Adak Naval Air Station
- 3 Fort Wainwright
- 4 Fort Richardson
- 5 Elmendorf Air Force Base
- 6 Luke Air Force Base
- 7 MCAS Yuma
- 8 Williams Air Force Base
- 9  
Tucson International Airport Area
- 10 Edwards Air Force Base
- 11  
Naval Air Station Alameda Main Barracks
- 12  
Camp Pendleton Marine Corps Base
- 13 George Air Force Base
- 14  
Castle Air Force Base (6 areas)
- 15  
McClellan Air Force Base (Ground Water Contamination)
- 16



- Charts superfund sites where, per EPA, PFAS contamination has been detected.

Norton Air Force Base (Landfill  
2)

17 March Air Force Base

18 Travis Air Force Base

19 Fort Ord

20

Barstow Marine Corps  
Logistics Base

21

Mather Air Force Base (AC&W  
Disposal Site)

22 Air Force Plant PJKS

23

Solvents Recovery Service of  
New England

24

Precision Plating Corporation

25 Beacon Heights Landfill

26 Gallup's Quarry

27 Laurel Park, Inc.

28 Kellogg-Deering Well Field

29

New London Submarine Base

30 Washington Navy Yard

31 Dover Air Force Base

32

Delaware Sand & Gravel  
Landfill

33 Army Creek Landfill

34 Blades Groundwater

35 Tyndall Air Force Base

36 Pensacola Naval Air Station

37

- Sites are numbered according to their listing in the EPA document shared with EPW.

- EPA IDs are given in the description of each pin, along with region.

Mountain Home Air Force  
Base

38 Chanute Air Force Base

39

US Savanna Army Depot  
Activity

40 Fort Riley

41 Plating, Inc.

42

Louisiana Army Ammunition  
Plant

43

South Weymouth Naval Air  
Station

44 Otis Air National Guard Base

45

Naval Weapons Industrial  
Reserve Plant

46 Fort Devens

47

Hanscom Field/Air Force Base

48 Silresim Chemical Corp.

49

W. R. Grace & Co. (Acton  
Plant)

50 Baird and McQuire

51 Walton & Lonsbury

52 Olin Chemical

53 MicroFab Inc (Former)

54

Charles George Reclamation  
Trust Landfill

55 Iron Horse Park

56 Nuclear Metals, Inc.

57 Industri-Plex

58 Re-Solve, Inc.

59

Fort Devens-Sudbury Training  
Annex

60 Sutton Brook Disposal Area

61 Sullivan's Ledge

62 Wells G&H

63 Groveland Wells

64

Nyanza Chemical Waste Dump

65 BJAT LLC

66

Beltsville Agricultural  
Research Center

67 Andrews AFB

68

Aberdeen Proving Ground -  
Edgewood Area

69

Aberdeen Proving Ground  
(Michaelsville Landfill)

70 Curtis Bay Coast Guard Yard

71 Patuxent River NAS

72 Fort George G. Meade

73 Brandywine DRMO

74 Portsmouth Naval Shipyard

75 Brunswick Naval Air Station

76 Loring AFB

77 Union Chemical Co., Inc.

78 Winthrop Landfill

79 Saco Tannery Waste Pits



80 McKin Co.

81 Leeds Metal

82 Keddy Mill

83 Wurtsmith AFB

84 Kentwood Landfill

85 Adam's Plating

86 State Disposal Landfill

87

DSC McLouth Steel Gibraltar  
Plant

88 Oakdale Dump

89 Washington County Landfill

90

Lake City Army Ammunition  
Plant (Northwest Lagoon)

91

Cherry Point Marine Corps Air  
Station

92

Camp Lejeune Military Res.  
(USNAVY)

93 Pease Air Force Base

94 New Hampshire Plating Co.

95 Beede Waste Oil

96

Kearsarge Metallurgical Plant

97 Tinkham Garage

98 Coakley Landfill

99

Keefe Environmental Services  
(KES)

100 Sylvester

101 Mottolo Pig Farm

102 Dover Municipal Landfill

103 Troy Mills Landfill

104

Somersworth Sanitary Landfill

105 Auburn Road Landfill

106

Savage Municipal Water  
Supply

107

South Municipal Water Supply  
Well

108 Tibbetts Road

109

Ottati & Goss/Kingston Steel  
Drum

110

Collins & Aikman Plant  
(former)

111

Naval Weapons Station Earle  
(Site A)

112 McGuire Air Force Base #1

113 Fort Dix (landfill site)

114 Picatinny Arsenal

115 Naval Air Engineering Center

116

Federal Aviation  
Administration Technical  
Center (USDOT)

117

Orange Valley Regional  
Ground Water Contamination

118 American Cyamid Co

119 Martin Aaron, Inc.

120 Helen Kramer Landfill

121 Fair Lawn Well Field

122

Garfield Ground Water  
Contamination

123 Seneca Army Depot

124

Griffiss Air Force Base (11  
Areas)

125 Plattsburgh Air Force Base

126

Brookhaven National  
Laboratory (USDOE)

127 Dewey Loeffel Landfill

128

Saint-Gobain Performance  
Plastics

129 Colesville Municipal Landfill

130 Onondaga Lake

131

Wright-Patterson Air Force  
Base

132 Buckeye Reclamation

133

Tinker AFB (Soldier  
Creek/Building 3001)

134

Letterkenny Army Depot (PDO  
Area)

135

Navy Ships Parts Control  
Center

136 Tobyhanna Army Depot

137

Naval Air Warfare Center  
Warminster

138

Letterkenny Army Depot (SE  
AREA)

139

Chem-Fab

140

North Penn - Area 2

141

AVCO Lycoming (Williamsport  
Division)

142

Raymark

143

Middletown Air Field

144

North Penn - Area 5

145

Watson Johnson Landfill

146

Rodale Manufacturing Co., Inc.

147

Valmont TCE Site (Former -  
Valmont Industrial Park)

148

Willow Grove Naval Air and Air  
Reserve Station

149

Safety Light Corporation

150

Newport Naval Education &  
Training Center

151

Western Sand & Gravel

152

Landfill & Resource Recovery,  
Inc. (L&RR)

153

Picillo Farm

154

Parris Island Marine Corps  
Recruit Depot

155 Ellsworth Air Force Base

156

Air Force #4 (General  
Dynamics)

157 Norfolk Naval Shipyard

158

Langley Air Force Base/NASA  
Langley Research Center

159

Naval Air Station, Whidbey  
Island (AULT Field)

160 Fort Lewis Logistics Center

161

McChord Air Force Base  
(Wash rack/treatment area)

162

Fairchild Air Force Base (4  
Waste Areas)

163

Moses Lake Wellfield  
Contamination

164

Allegany Ballistics Laboratory

165 F. E. Warren Air Force Base

166

BFI Sanitary Landfill  
(Rockingham)

167

US Defense General Supply  
Center (DLA)

168

St. Juliens Creek Annex (U.S.  
Navy)

169

Norfolk Naval Base (Sewells  
Point Naval Complex)

170 Fort Eustis (US Army)

171

Naval Surface Warfare Center -  
Dahlgren

172

Naval Weapons Station -  
Yorktown

173

Arrowhead Associates,  
Inc./Scovill Corp.

174 Old Springfield Landfill

175 Burgess Brothers Landfill

176 Pownal Tannery

177 Commerce Street Plume

178

Bennington Municipal Sanitary  
Landfill

179

Davisville Naval Construction  
Battalion

180 MCAS El Toro

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