

July 17, 2024

Richard Rogers, Director
Division of Water Resources
NC Department of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

Director Richard Rogers,

We are residents of Alamance County, writing today to request that you issue an Interim Maximum Allowable Concentration (IMAC) for eight per- and polyfluorinated compounds (PFAS). We're asking for this because some of these compounds have been found in our wells, and others may be in the future, and we want clarity on what science says is safe for our families and what level of remediation will be needed to protect us.

Our community is a small rural area in Alamance county between Graham and Swepsonville. I am a firefighter in Greensboro, and serve as the volunteer deputy chief for the small town of Swepsonville. My wife works full time at North State Dental Partners and we 2 have small children. Both my wife and I spend countless hours serving in our local community to help those who need someone when the unthinkable and unexpected happen. My mother and father are retired, and live down the hill from us. They keep a large garden in the adjacent field. I have lived here my entire life. Our neighbors, Steve Wall and his wife Patty, were small business owners in Graham for several decades. Their business was an invaluable resource for local farmers to provide fresh meat and produce to our community members. Todd Deans is a full time truck driver, and has several horses and other livestock on his land. Jack Bowers worked in wastewater treatment for the local government. We have all worked hard throughout our careers to be able to provide for our families and have enjoyed our lives out in the country and the privacy, serenity, and peace this area has offered. We no longer feel that peace, as our groundwater has been contaminated beyond safe levels. We have lived in these homes for decades and have raised our kids and grandkids on this land, all while drinking the contaminated groundwater.

We recently discovered that our wells were contaminated with extremely high levels of PFAS. These wells not only provide our water for our families for drinking, cooking, bathing, and cleaning throughout our homes, but also provide water to livestock, horses, and other pets. Among the six families in our area, the levels ranged from a total of 370.4 ppt to 3587.3 ppt total PFAS. These tests were run by Detlef Knappe at NC State University using the EPA method 1633. The tests showed high levels of PFAS for the following compounds in our well: PFOA, PFOS, PFBS, PFNA, PFHxS, PFBA, PFHxA, among others.

	PFOA	PFOS	GenX	PFBS	PFNA	PFHxS	PFBA	PFHxA
Your Well	291.5	7.7	<MRL	272.2	9.4	44.8	389.3	1216.2

These eight compounds have been thoroughly studied by the NC Department of Environmental Quality. Therefore, we are asking to issue IMACs for PFOA, PFOS, PFBS, PFNA, PFHxS, PFBA, PFHxA, and GenX. Though we did not find GenX in our groundwater, we believe that this is an important addition to our request for the safety of communities across the state.

We’re asking for you to issue IMACs for these PFAS because we want to know what the state considers a ‘safe’ level based on the best current science. We recognize that, in the absence of a groundwater standard, the target for remediation will be the practical quantitation limit, and in some cases, the IMAC you issue may be higher. On the other hand, we don’t yet know what responsible party caused our contamination; when they are identified, they may argue for a less protective cleanup, and they may be able to afford well-heeled lawyers and scientists. We are asking for you to issue a fair and scientific IMAC now so we know where we stand.

Under 15A NCAC 02L .0202(c), “any person may request the Director of the Division of Water Resources to update or remove an existing IMAC in accordance with the specific guidelines listed in [15A NCAC 02L .0202(c)(1)-(9).] The requestor shall submit relevant toxicological and epidemiological data, study results, and calculations in accordance with [15A NCAC 02L .0202(d) and (e).]”

In this case, DEQ has already prepared a very thorough scientific analysis and a full regulatory impact analysis of the costs and benefits of setting health based groundwater concentrations for these eight PFAS. We incorporate those, attached to this letter, by reference, as the materials required by 15A NCAC 02L .0202(c). Specifically, the ‘toxicological and epidemiological data and study results’, and the calculations used to derive the health value, are documented in [Fiscal and Regulatory Impact Analysis for the Amendment to 15A NCAC 02L .0202, Groundwater Quality](#)

Discovering that we have toxic PFAS in our drinking water wells has been stressful and frightening, and the response from government has been disheartening. Issuing an IMAC will only be one step towards the relief we need, but it will at least give us greater clarity about the risk we face and the eventual obligations for unknown responsible parties to address the contamination they have visited upon us.

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