



The Mount Vernon Council of Citizens Associations, Inc.

P.O. Box 203, Mount Vernon, VA 22121-9998

<http://www.mvcca.org>

Susan Mackert
DEQ-Northern Regional Office
13901 Crown Court
Woodbridge, VA 22193

May 31, 2025

**RE: MOUNT VERNON COUNCIL OF CITIZENS' ASSOCIATIONS (MVCCA)
Resolution on the need for Fort Belvoir Stormwater Permit to Include PFAS (MVCCA,
E&R 2025-02)**

Dear Ms. Mackert,

The Mount Vernon Council of Citizens' Associations (MVCCA) has reviewed the stormwater permit for Fort Belvoir and has provided our comments in the attached resolution. We specifically ask that high levels of PFAS contamination be addressed, sources remediated, and that the stormwater permit should include limits on PFAS emissions to ensure that high levels of PFAS are not being released into our waterways. It will be far more cost effective to clean up the sources than chasing PFAS in waterways once they have migrated off base. Given that PFAS contaminations are well above health based cleanup levels and are often referred to as forever chemicals, addressing PFAS from Fort Belvoir and other sources should be a priority.

The MVCCA includes about 40 community associations. We welcome questions and thank you for your consideration of these comments.

Respectfully,

Scott Taylor
Co-chair, MVCCA

**cc: Mike Rolband, Director DEQ
Senator Scott Surovell
Delegate Paul Krizek
Fairfax County Board of Supervisors**

Attachment: Resolution

MOUNT VERNON COUNCIL OF CITIZENS' ASSOCIATIONS (MVCCA) Resolution on the need for Fort Belvoir Stormwater Permit to Include PFAS (MVCCA, E&R 2025-02)

Whereas, per- and polyfluoroalkyl substances (PFAS) include toxic chemicals that break down very slowly in the environment;

Whereas, PFAS chemical are found in humans, animals and plants;

Whereas, the Environmental Protection Agency issued a final rule promulgating Maximum Contaminant Levels (MCL) for some PFAS compounds and has designated two widely used PFAS chemicals, perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS), as hazardous substances under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA);

Whereas, a Preliminary Assessment/Site Inspection for PFAS on Fort Belvoir reports groundwater contamination exceeding the MCL by a factor of over a thousand in multiple locations and contamination in other media;

Whereas, the Virginia Department of Environmental Quality (DEQ) has announced a June 2 hearing on Fort Belvoir's draft Virginia Pollutant Discharge Elimination System permit; Whereas, both Wild Virginia and the Potomac Riverkeeper have highlighted the failure of an earlier draft of the Fort Belvoir permit to include PFAS;

Whereas, the most efficient way to address contamination is to eliminate the source of contamination before it is released into the environment where it spreads in water, soils, fish and otherwise contaminates the environment; and

Whereas, failure to limit PFAS in the discharge permit will likely require that PFAS contamination be addressed under the Superfund Program.

Therefore, be it resolved that the DEQ should require the draft Fort Belvoir permit to be amended to include PFAS discharge limits;

Be it further resolved that in the absence of Virginia state standards that the discharge limits be based upon the adopted MCL for water and EPA regional screening levels for soil.

Approved by the MVCCA Members on May 28, 2025