

October 1, 2018

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**SENT BY ELECTRONIC MAIL**

RE: Public Comment on Proposed Development of New Water Quality Criteria for PFOA and PFOS as part of the 2018-2020 Triennial Standards Review, Priorities for the Water Quality Standards Program

Dear Marcia,

We are writing to express our strong support for the WDNR recommendation to include PFOA and PFOA as priorities in the Water Quality Standards program for the development of Water Quality Criteria with one amendment.

We recommend amending the title and corresponding scope of work to read "PFAS with emphasis on PFOS and PFOA" to reflect:

- (1) the current scientific understanding of PFAS as a mixture/family of more than 5,000 chemicals,
- (2) consistency with the development of Water Quality Criteria for other contaminant groups, and
- (3) actual site conditions such as those at the Tyco/Johnson Controls facility near Marinette, Wisconsin.

Specifically, our recommendation assures that the Department may consider, as part of its deliberations, the summed-total concentration of all Per- and Polyfluoroalkyl Substances (PFAS), inclusive of precursors. This approach is reasonable and consistent with the establishment of national Water Quality Criteria for other families of chemicals.

For example, the national Water Quality Criteria for Polychlorinated Biphenyls (PCBs) for human health for the consumption of water plus organism and the consumption of organisms alone is for [total PCBs](#) (e.g., the sum of all congener or all isomer or homolog or Aroclor analyses). For DDT, EPA's recommended Water Quality Criteria for human health is based on the summed-total concentration of [DDT and its metabolites](#).

Addressing PFAS as a class of contaminants is also consistent with environmental field data which consistently finds PFAS as a mixture of widely varying relative ratios and combinations which, in turn, may shift in response to other factors such as aerobic conditions.

The most notable industrial PFAS site in Wisconsin to date is the Tyco Fire Technology Center (Johnson Controls) near Marinette. Environmental analysis has detected the following 19 PFAS in groundwater and/or soils.

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|--|---|
| 1. Perfluorobutanesulfonic acid (PFBS)   | 11. Perfluorononanoic acid (PFNA)       |
| 2. Perfluorohexanesulfonic acid (PFHxS)  | 12. Perfluorodecanoic acid (PFDA)       |
| 3. Perfluoroheptanesulfonic acid (PFHpS) | 13. Perfluoroundecanoic acid (PFUnA)    |
| 4. Perfluorooctanoicsulfonic acid (PFOS) | 14. Perfluorododecanoic acid (PFDoA)    |
| 5. Perfluorodecanesulfonic acid (PFDS)   | 15. Perfluorotridecanoic acid (PFTriA)  |
| 6. Perfluorobutanoic acid (PFBA)         | 16. Perfluorotetradecanoic acid (PFTeA) |
| 7. Perfluoropentanoic acid (PFPA)        | 17. Perfluorooctane sulfonamide (FOSA)  |
| 8. Perfluorohexanoic acid (PFHxA)        | 18. 6:2 Fluorotelomer sulfonate (FTS)   |
| 9. Perfluoroheptanoic acid (PFHpA)       | 19. 8:2 Fluorotelomer sulfonate (FTS)   |
| 10. Perfluorooctanoic acid (PFOA)        |   |

And finally, our recommendation is made necessary by the fact that manufacturers and responsible parties uniformly refuse to disclose PFAS product content and composition, arguing that such information is proprietary.

Sincerely,

Laura Olah, Citizens for Safe Water Around Badger

Maria Powell, PhD, Midwest Environmental Justice Organization

Vicki Quint, Fire Fighter Cancer Foundation

Jeffrey Lamont, Concerned Friends and Neighbors

Jennifer Giegerich, Wisconsin League of Conservation Voters

Eric Uram, Headwater, LLC

Ann Behrmann, MD, Physicians for Social Responsibility Wisconsin

John Peck, Family Farm Defenders

Matthew Reetz, Madison Audubon Society

Ann Behrmann, MD, Wisconsin Environmental Health Network

Elaine Swanson, People Empowered Protect the Land (PEPL) of Rosendale

Ann Fonfa, Annie Appleseed Project

Al Gedicks, Wisconsin Resources Protection Council

Dace A. Zeps, Wisconsin Network for Peace, Justice, & Sustainability

Dean Hoegger, Clean Water Action Council of Northeast Wisconsin

Kimberlee Wright, Midwest Environmental Advocates

Shaina Kasper, Toxics Action Center

**Submitted by:**

Laura Olah | Executive Director

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