

January 15, 2020

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RE: Public Comment Supporting PFAS Scope Statements

Dear Members of the Wisconsin Natural Resources Board:

PFAS contamination has been detected in soil, surface water and groundwater in communities throughout Wisconsin including Camp Douglas, Chilton City, Hudson, La Crosse, Madison, Manitowoc, Marinette, Middleton, Milwaukee, Rhinelander, South Milwaukee, Sparta, and Superior.

Altogether, 36 PFAS compounds have been detected in or pose a significant risk to Wisconsin's groundwater resources. Prompted by formal petitions from Citizens for Safe Water Around Badger (CSWAB), state health officials are currently working on health-based standards for all 36 compounds in groundwater – the primary source of drinking water for Wisconsin residents.

On behalf of CSWAB, I am writing to voice our strong support for the three scope statements and the rulemaking process moving forward. We support the State's proposed steps to identify and protect communities from exposure to PFAS and to prevent harm to all natural systems including air, water, soil and biodiversity.

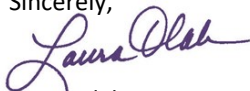
There are currently no enforceable federal standards for PFAS in groundwater or drinking water. The U.S. EPA has established a lifetime Health Advisory Level for PFOA and PFOS in drinking water however it is not applicable to the complex mixture of PFAS found in Wisconsin's groundwater and affected drinking water wells. Moreover, ATSDR's recently-released draft toxicological profile for perfluoroalkyls provides strong evidence that the current federal HAL is not sufficiently protective.

PFAS chemicals never occur alone. They are present in complex mixtures within products, the environment, and people. The PFAS family is incredibly large – numbering in the thousands, with more than 600 in active commercial use. Assessing risks of chemicals having a similar mechanism of toxicity is not unusual and is similar to how other chemical groups such as dioxins, PAHs and PCBs have been assessed and regulated.

A class approach 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. And further, a class approach 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.

Thank you for the opportunity to provide comment and to participate in this important decision-making process.

Sincerely,



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