



State of Wisconsin
Department of Health Services

Tony Evers, Governor
Andrea Palm, Secretary

January 22, 2020

The Honorable Dave Hansen
State Senator
State Capitol
P. O. Box 7882
Madison, WI 53707-7882

Dear Senator Hansen:

Thank you for your letter from January 7, 2020 requesting that DHS undertake testing for PFAS in the blood of residents of the City of Marinette, the Town of Peshtigo and surrounding areas, and to conduct a cancer assessment in the area. The issue of PFAS exposure and the concerns of the Marinette community are very important to us. We are using this opportunity to reply to your letter to describe our understanding of the issues, the things we are currently doing, and invite additional discussion about what could be done going forward.

Blood testing

We understand your interest and the interest of community members in conducting a study to obtain information on the levels of PFAS in the blood of residents. This is a topic to which we have given a good deal of consideration in recent months. Your request has provided us with another opportunity to consider this approach, and we are including an invitation for additional discussion at the end of this letter.

Broadly speaking, there are three general purposes for blood testing related to a chemical exposure: (1) to *inform physicians* how to advise their patients about their expected health effects and courses of treatment; (2) to determine overall levels and potential sources of exposure in a community through a *biomonitoring study*; and (3) to gain general knowledge about the potential health effects of chemical exposure through a *human health study*.

- **Informing physicians.** As to this first purpose, it is an unfortunate reality at this time that PFAS results in blood do not provide information to help physicians predict health problems or guide medical treatment for their patients. Even when PFAS blood testing is performed as part of biomonitoring or human health studies, the results cannot characterize the health risks for individual study participants. In places where these studies are being done, researchers explain this to the participants as part of their work.
- **Biomonitoring study.** The Department of Health Services has conducted biomonitoring assessments on a variety of chemicals and exposure scenarios in recent years. In order to successfully determine overall levels and potential sources of exposure in a

community, a biomonitoring study requires: (a) identify a representative sample of persons who were potentially exposed to PFAS as well as a control group (e.g., unexposed population); (b) design, test, and validate an exposure survey; (c) perform blood sample collection; (d) conduct laboratory and statistical analyses; and (e) conduct extensive outreach, recruitment, and education to participants. If these resources were available, it is likely that the relatively small population size in and around the affected area would make it difficult to generate useful findings about exposure to and sources of PFAS. One solution to this issue may be to work with partners outside of Wisconsin to develop a larger multi-community exposure approach to increase the number of participants and the degree to which the findings of such a study could yield generalizable results.

- **Human health study.** Human health studies can provide valuable information about the harmful effects of chemicals in exposed persons. However, findings from any single study are seldom conclusive and generally must be combined with results from other human health studies to reach conclusions about potential impacts on health. Studies such as these are typically carried out by academic centers and are conducted over a period of many years. The Centers for Disease Control and Prevention (CDC) is currently funding several academic centers across the United States to study over 6,000 adults and 2,000 children to learn more about the effects of these chemicals in people.

Community cancer concerns

Cancer represents one of the most challenging and concerning health issues in our state, and every cancer diagnosis is a life-altering event that deserves our consideration and merits our compassion. In our role as the state's public health agency, we often receive inquiries from residents, health care providers, and others about cancer diagnoses in communities and related concerns about potential chemical exposures that may be contributing factors. When responding to these concerns, DHS follows a standard protocol that involves (a) investigating the types of cancers that have been reported, (b) learning about potential risk factors that may contribute to increased occurrence, and (c) assessing if there are chemicals in the environment that could pose a risk. The cancer risk from PFAS is an ongoing area of active research. There is limited information that perfluorooctanoic acid (PFOA) is associated with increased rates of kidney and testicular cancer. These associations are not consistent across studies, and no causal relationship has been established. There is no evidence that PFOA increases the risk of breast, lung, bladder, liver, or pancreatic cancer.

DHS continues to work with the community in Marinette to provide education on cancer risk, specifically relating to PFAS, and has provided education at public listening sessions and through written materials. When DHS receives concerns about elevated rates of specific cancer types, we review reported cases and assess for potential community exposure. Evidence linking PFAS to cancer is currently limited, and determining how PFAS exposure may lead to increased cancer risk will require multiple large studies in exposed populations and additional studies in laboratory animals.

What DHS is doing

In conjunction with the DNR, the Marinette County Health Department and others, DHS has been working with the community in and around Marinette to conduct assessment and educational activities related to PFAS. Specifically, we are conducting a Public Health Assessment to identify potential unsafe routes of PFAS exposure in the community and making recommendations to protect public health. We will also be communicating with physicians in the Marinette area to provide information on these topics. DHS will also be reaching out to the federal Agency for Toxic Substances and Disease Registry (ATSDR) to discuss community cancer concerns and see what support and information can be provided by our federal partners. In 2019, we developed recommendations for groundwater enforcement standards for PFOA and perfluorooctanesulfonic acid (PFOS), and we are currently working on similar recommendations for more than a dozen different PFAS chemicals. We have also worked with DNR and our partners in other Great Lakes states to develop and refine best practices for health advice for anglers fishing in streams and lakes that contain PFAS. In all of these efforts, we recognize the most effective public health intervention is to reduce exposure, and we remain actively and steadfastly engaged in providing outreach to the public on protective measures.

We appreciate your willingness to bring your concerns and those of your constituents to our attention, and we thank you for your advocacy on this important environmental public health issue. As PFAS is increasingly becoming a statewide issue, we are looking for opportunities to better address the similar needs of communities across the state. We believe the experience of citizens and leaders in Marinette can help to shape public policy and response to this issue. DHS is an active participant in the Governor's PFAS Action Council, and we would be pleased to meet with your office in the upcoming weeks to help bring your community's perspective to our work on this Council. We look forward to taking what we learn from our conversations on this topic to inform statewide policy and action as we move forward.

Sincerely,



Lisa Olson
Legislative Director