

Testimony On WY-23-19 Surface Water Standards for PFOS and PFOA

My name is Doug Oitzinger. I am a former Mayor of the City of Marinette, and I am a current City Council member. I support the rule making efforts of WY-23-19, but I specifically find the standard for PFOA too high at 20 ng/L for public water supplies and 95 ng/L for other surface waters. The proposed DNR *groundwater* standard is a combined 20 ng/L for PFOS and PFOA. This rule would allow a combined PFOS/PFOA standard of 28 ng/L for surface water used for public water supplies and 103 ng/L for other surface waters.

My city ward includes the source of one of the greatest PFAS contamination sites in Wisconsin and the ongoing PFAS contamination of surface water in the Bay of Green Bay of Lake Michigan: the Tyco/JCI Fire Technology Center in the City of Marinette. It is without a doubt that the PFAS contamination investigation in my community is the most mature and extensive the State of Wisconsin has conducted to date. There is a ditch ("Ditch B" designated in DNR correspondence) one-half block from my home emptying into the Bay's waters flowing twenty-four hours a day, seven days a week contaminating the water we use for recreation, the public water supply used for drinking, the fish that we catch and eat, and wildlife that drink the water. The DNR has issued a "Do Not Eat Deer Liver" advisory in our area because of the surface water that the deer use as drinking water is contaminated with PFAS and it collects in the deer's liver. The wildlife and fish testing in our area is in the early stages of investigation, but we already know there is a problem.

The proposed rule appears to base its calculations of the behavior of PFOS in fish and not on the combination of PFOS/POFA in other species and in humans. I do not understand how the science can lead the Department of Health Services to conclude that any combination of PFOS/PFOA above 20 ng/L is a risk to human health in *groundwater*, but when it comes to polluting the surface waters of Wisconsin, 103 ng/L of PFOS/PFOA is ok.

There is another ditch (designated "Ditch A" in DNR correspondence) that also emanates from the Tyco/JCI contaminated PFAS site in my Ward. The difference between Ditch A and Ditch B is that Ditch B is largely a "receiver" of PFAS contaminated *groundwater* which upwells into the surface water which then carries that contamination to the Bay of Green Bay; while Ditch A is a source of contaminated water that carries its contamination into rural Town of Peshtigo residential property and sheds its contamination to *groundwater and private drinking wells*.

By raising the combined PFOS/PFOA standard to 103 ng/L for surface water, ditches such as "Ditch A" will be contaminating *groundwater* to an unacceptable level exceeding the draft *groundwater standard* by over 500%. The description of "Ditch A" I just made isn't theoretical, it is documented in existing site investigation reports and is commonly understood in the Agency.

Therefore, I both support the rule making effort for PFOS and PFOA standards in surface waters and I urge that the standards be changed to 8 ng/L for PFOS, 20 ng/L for PFOA, or any combination of PFOS/PFOA at 20 ng/L for all surface waters regardless of their use as a public water supply.

