



October 18, 2019

VIA HAND DELIVERY

Preston Cole
Secretary
Wisconsin Department of Natural Resources
101 S. Webster Street
P.O. Box 7921
Madison, WI 53707-7921

Darsi Foss
Environmental Management Division Administrator
Wisconsin Department of Natural Resources
101 S. Webster Street
P.O. Box 7921
Madison, WI 53707-7921

RE: Municipal Wastewater Utility PFAS Initiative

Dear Secretary Cole and Administrator Foss:

We are writing today on behalf of the Municipal Environmental Group – Wastewater Division, the League of Wisconsin Municipalities, and Wisconsin Rural Water Association as representatives of numerous municipalities that own and operate wastewater treatment plants, often referred to as Publicly Owned Treatment Works (POTWs).

The mission of our municipal members is to protect public health and the environment through the treatment and reclamation of wastewater. POTWs are the boots on the ground that make clean water happen. On behalf of our members, we share the Department's concern about PFAS compounds, and we agree that ultimately the solution to this concern is to reduce PFAS coming into POTWs because "end of pipe" treatment for POTWs is not feasible.

On July 22, 2019, the Department of Natural Resource (Department) mailed a letter to 125 Publicly Owned Treatment Works (POTWs). The letter requested that these POTWs voluntarily undertake sampling of influent and effluent for PFAS compounds and report the results within 90 days. The Department indicated that based on the results

from those tests, it would further request that these POTWs “review... industrial users to identify facilities that may be potential sources of PFOA and PFOS.”

As a result, we are encouraging our members to undertake the work that the Department requested by identifying facilities that may be potential users of materials containing PFOA and PFOS and developing a plan to work with these facilities to reduce sources of PFAS through product substitution or other Pollution Minimization Plan (PMP) alternatives. In particular, we are advising our membership to undertake the following steps:

- We are in the process of developing a screening criteria to identify any commercial or industrial dischargers in a POTW’s sewer service area that could potentially be users of PFOS and PFOA containing materials. The screening criteria will be based on the tool used in Michigan, with feedback from the Department, our members, and other stakeholders.
- Once potential dischargers have been identified, we are advising our membership to contact these individual dischargers and work them to identify and reduce of the use of products containing PFOS and PFOA. POTWs have successfully used this approach to reduce mercury and chlorides in wastewater influent.
- We will be working with our members and the Department to develop protocols for addressing known sources of PFOS and PFOA such as spent firefighting foam and sites where concentrated historic contamination has occurred.

This approach is designed to provide immediate results and is not dependent on first obtaining influent and effluent samples from POTWs. For this reason we have advised our membership not to undertake sampling at this time as a precursor to taking action. We also have two other significant concerns with sampling at this time:

- Sampling protocols and lab certification have not been completed for these compounds and we do not anticipate that any labs will be certified for some time.
- There are no surface water standards for PFAS compounds, and in fact, the scope statement for that rule development for those standards was just recently announced.

Generating test results in the absence of certified labs and surface water standards does not provide POTWs, the Department, or the public with meaningful information. The most meaningful steps POTWs can take at this time are to work with the Department

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and dischargers to reduce sources of PFOA and PFOS. As this letter explains, our municipal members are committed to doing just that.

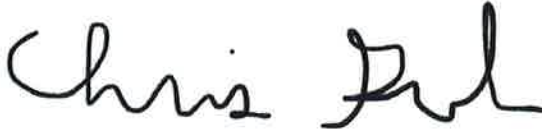
Best regards,



Paul G. Kent
Vanessa D. Wishart
MEG Wastewater



Curt Witynski
Wisconsin League of Municipalities



Chris Groh
Wisconsin Rural Water Association

cc: Jason Knutson
Chief, Wastewater Section

Wade Strickland
Chief, Water Permits Section