



January 17, 2019

Ms. Laura Olah, Executive Director
Citizens for Safe Water Around Badger
E12629 Weigand's Bay South
Merrimac WI 53561

Subject: Public Petition for Health Advisory Levels for PFAS in Groundwater and Drinking Water with Emphasis on the Tyco/Johnson Controls PFAS site - BRRTS Activity No. 02-38-580694

Dear Laura:

Thank you for your August 16, 2018 letter requesting that the department set a Health Advisory Level (HAL) for the summed-total concentration of all Per- and Polyfluoroalkyl Substances (PFAS) – including precursors – detected in the State's groundwater and/or having a reasonable probability of entering groundwater.

As you know, the department submitted a request to the Department of Health Services (DHS) to review two PFAS compounds (PFOS and PFOA), along with 24 other substances on March 2, 2018. DHS will recommend to the department an enforcement standard for each substance, provided that adequate scientific technical information is available.

The department has reviewed your recent petition, along with other PFAS compounds detected in Wisconsin (see the attached table) and has added all of them to the list maintained by the department under Chapter 160 Wis. Stats., thereby granting your petition. Following the established agreement with DHS, the list, including PFAS compounds identified, will be considered for the next submission to DHS under ch. 160, Wis. Stats.

Your petition requests Health Advisory Level (HAL) be established for the summed-total concentration of PFAS. As you know, the United States Environmental Agency (USEPA) has already set federal HALs for PFOA and PFOS both individually and combined at 70 parts per trillion. Wisconsin uses federal HALs when they are available, so Wisconsin already refers to the federal HALs for PFOA and PFOS when evaluating water sampling results. The department will work with DHS to determine the ability to generate HALs for other PFAS based on occurrence, program needs and available toxicological information concurrently with the ch. 160, Wis. Stats. process discussed above. Until DHS reviews the available scientific information, it is unknown whether or not a summed-total concentration is an appropriate approach.

As you are aware, PFAS in groundwater is a national issue, and as such, the department is continuing to work with the USEPA Region 5 and the Association of State Drinking Water Administrators on this complex issue. Some helpful links are included below:

<https://www.epa.gov/pfas>
<https://asdwa.org/pfas>

If you have questions regarding this matter please feel free to contact me at (608) 264-9246, or via e-mail at: Steve.Elmore@wisconsin.gov.

Sincerely,



Steven B. Elmore, Director
Bureau of Drinking Water and Groundwater
Wisconsin Department of Natural Resources

<u>Compound</u>	<u>CAS Number</u>
Perfluorooctanoic acid (PFOA)	335-67-1
Perfluoro tridecanoic acid (PFTrDA)	72629-94-8
Perfluoro tetradecanoic acid (PFTeDA)	376-06-7
Perfluoro butanoic acid (PFBA)	375-22-4
Perfluoro pentanoic acid (PFPeA)	2706-90-3
Perfluoro hexanoic acid (PFHxA)	307-24-4
Perfluoro heptanoic acid (PFHpA)	375-85-9
Perfluoro nonanoic acid (PFNA)	375-95-1
Perfluoro decanoic acid (PFDA)	335-76-2
Perfluoro undecanoic acid (PFUdA)	2058-94-8
Perfluoro butanesulfonic acid (PFBS)	375-73-5
Perfluoro hexanesulfonic acid (PFHxS)	355-46-4
Perfluoro octanesulfonic acid (PFOS)	1763-23-1
Perfluoro heptanesulfonic acid (PFHpS)	375-92-8
Perfluoro octanesulfonamide (PFOSA)	754-91-6
Perfluoro-2-methyl-3-oxahexanoic acid (PFPrOPrA)	13252-13-6
Perfluoro dodecanoic acid (PFDoA)	307-55-1
4:2 Fluorotelomer sulfonic acid (4:2_FTS)	757124-72-4
6:2 Fluorotelomer sulfonic acid (6:2_FTS)	27619-97-2
8:2 Fluorotelomer sulfonic acid (8:2_FTS)	39108-34-4
Perfluoro hexadecanoic acid (PFHxDA)	67905-19-5
Perfluoro octadecanoic acid (PFODA)	16517-11-5
Perfluoro decanesulfonic acid (PFDS)	335-77-3
Perfluoro pentanesulfonic acid (PFPeS)	2706-91-4
NaDONA	958445-44-8
F-53B	73606-19-6