

November 26, 2019

Madison Water Utility Board  
119 E. Olin Ave.  
Madison, WI



**Dear Board Members:**

Thank you again for directing the Water Utility to test all Madison wells for 24-30 PFAS compounds after [we and other community residents requested it](#) last February.

The [Water Utility's final PFAS report](#), based on this testing, provides a wealth of valuable information about the types and levels of PFAS compounds in our drinking water wells. Thanks to Water Utility staff, especially Joe Grande, for facilitating this challenging testing, complex analyses of data, and putting together a clear and comprehensive report summarizing the findings.

While very valuable, this report doesn't put Madison's drinking water PFAS issues to rest. As you know, PFAS are "forever chemicals," so unfortunately they are not going away in our lifetimes. PFAS are extremely mobile in water, and will continue to spread in surface water and the aquifer under Madison, drawn in different directions by the varied pumping of our deep wells. In Minnesota PFAS plumes have traveled many miles in groundwater and surface water (with complex interactions between the two), spreading [over 130 square miles](#) (see pg. 16).

One of the key reasons we proposed testing all Madison wells was to identify potential sources of PFAS throughout Madison—not just near Truax Field. The plume emanating from Truax Field has spread for decades and will continue to do so indefinitely, likely affecting other wells (as the Minnesota experiences shows). There are also many other ongoing sources of PFAS to Madison wells and surface water that have not yet been identified or evaluated. Given this, adequate levels of continued monitoring are needed to assess PFAS trends in our wells over time.

While PFAS has been spreading in the environment for decades, debates about Wisconsin and federal standards are just beginning. As expected, industrial and municipal lobbying groups are pushing back on Wisconsin DNR's efforts to develop comprehensive PFAS standards for groundwater, drinking water, and surface water, arguing among other things, that adhering to more protective standards and more testing is too costly and we should wait for federal PFAS standards (which some have predicted will take about ten years). The development of state standards for just two PFAS (PFOS/PFOA) will take about 3 years and it will be many more years after that till state standards for the many other PFAS compounds found in our wells and surface water are developed.

While state and federal standards are under development over the next several years, PFAS sources in Madison—along with current human and environmental exposures to PFAS—should be identified and prevented as soon as possible. Costs and lack of standards should not be used as excuses not to protect health and the environment.

**In this context, MEJO asks the Water Utility Board to:**

- 1) Formally support DNR's proposals to develop Wisconsin drinking water, groundwater, and surface water PFAS standards** to help guide decisions here (in line with Mayor Rhodes-Conway's letter of support).
- 2) Direct the WU to officially adopt Vermont's standard of 20 ppt for five PFAS as an interim policy** while waiting for Wisconsin to develop PFAS standards supporting the request of the Greater Sandburg Neighborhood Association, and as we asked in our [July 23](#) and [August 27](#) comments.

In line with our requests, at the August 19, 2019 Water Utility Technical Advisory Committee meeting, most committee members supported adopting the Vermont standard as an interim standard (one of several options presented), but didn't officially support it at the end of the meeting, after one prominent member suggested waiting for DHS to evaluate more PFAS compounds (which will take years).

However, the [notes from this TAC meeting](#) (see pg. 15-16 of the pdf) say: "Individual polling conducted after the meeting showed broad support for employing the Vermont standard of 20 ng/L for 5 PFAS chemicals as an interim standard until the DHS evaluates the expected toxicity of a broader range of PFAS. The outcome of this choice is identical to keeping the well off-line until DHS staff completes its toxicological review of other PFAS compounds."

People we have talked to in the Greater Sandburg Neighborhood Association, the low income Truax neighborhood, and others in the Well 15 service area have expressed much relief that Well 15 is no longer providing their drinking water. We are concerned that though Well 15 is off, with no current policy prohibiting the Water Utility from turning it back without treatment, it might do so if the need arises. Last spring, after the Water Utility turned Well 15 off (before DHS proposed the 20 ppt standard) the WU and PHMDC said they believed Well 15 is safe and would turn it back on after the DHS standard was released. This did not happen, and August TAC meeting notes say "Well 15 remains off-line with no immediate plans to bring it back into service."

Relatedly, we are also concerned that we received no response to our [October 22 request](#) that the Water Utility share what the process will be for decisions about future Well 15 use (e.g., if the Water Utility wants/needs to turn the well back on, will people in the Well 15 service area be informed and have a say?). Adopting the Vermont standard would provide assurance and clarity for the community on what policy would guide this decision.

### **3) Discuss PFAS sources to wells, and ways to reduce/eliminate them, at future board meetings.**

Now that the City-County PFAS Task Force we proposed in February has been tabled by the Common Council Executive Committee, and the county has apparently formed its own PFAS Working Group (whose members are unknown and meetings non-public) (see BCC [here](#)), the Water Utility Board remains one of the only places where the public can provide input and raise questions about critical PFAS issues that will challenge our drinking water and health for generations.

**Future board agendas should include** (as we asked in our [July 23](#) and [August 27](#) comments):

- PFAS in ongoing dewatering discharges in Reindahl Park next to Well 15
- PFAS in groundwater at the former Burke sewage treatment plant south of the airport
- Working with the Madison Fire Department to switch to fluorine-free foams
- Identifying/eliminating the use of pesticides with PFAS in Madison/Dane County
- Other sources of PFAS to Madison wells--especially those with the highest PFAS levels—and how to eliminate or mitigate them.

**4) Direct the Water Utility to increase frequency of planned PFAS monitoring.** The current plan of once a year testing for all wells is inadequate. More than once a year monitoring is needed to adequately assess trends in PFAS levels over time, especially in different seasons/years as some wells are off (Well 15) and so other wells on the north/east sides will be pumping harder, drawing the plume originating at Truax Field and other as yet unidentified PFAS sources more strongly in their direction. We propose that wells found to have at least one detectable PFAS should be tested twice a year and wells with the highest levels (e.g., 9, 23, 15 if/when on) should be tested quarterly. We realize that this testing is costly but feel that it is worth it to detect any significant increases in PFAS levels in wells and take steps to address them sooner than later.

Thank you very much for considering our comments.

/s/ **Maria Powell, Executive Director, MEJO**