

## Borski, Jennifer - DNR

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**From:** Brian Kreski <Brian.Kreski@Appleton.org>  
**Sent:** Friday, September 13, 2019 8:12 AM  
**To:** Borski, Jennifer - DNR  
**Cc:** Hodgson, Scott A.  
**Subject:** 2019 Request for Information - PFAS Survey  
**Attachments:** 190910\_AWWTP PT Program PFAS Sources\_NW Mauthe.pdf

Hi Jennifer,

The Wisconsin Department of Natural Resources (WDNR) recently launched a statewide initiative requesting that wastewater treatment plants identify potential PFOA and PFOS (PFAS Substances) within their respective service areas. With that, I have attached the Appleton Wastewater Treatment Plant's survey request letter and forms that should correlate to your specific industry.

Please let me know if you have any questions,

*Brian J. Kreski*

Brian Kreski  
City of Appleton Department of Utilities  
Environmental Programs Coordinator  
2006 East Newberry Street  
Appleton, WI 54915

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<http://www.appleton.org/government/utilities/wastewater-treatment/compost-program>



*"...meeting community needs...enhancing quality of life."*

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September 10, 2019

JENNIFER BORSKI  
WISCONSIN DEPARTMENT OF NATURAL RESOURCES  
625 E COUNTY ROAD Y  
SUITE 700  
OSHKOSH, WI 54901

**RE: 2019 Request for Information - PFAS Sources**

Dear Ms. Borski,

The City of Appleton Wastewater Treatment Plant (AWWTP) is currently investigating potential sources of Polyfluoroalkyl Substances (PFAS), specifically targeting Perfluorooctanoic acid (PFOA) and Perfluorooctane Sulfonate (PFOS). PFAS chemicals have been manufactured domestically and internationally since the 1940s and can be found in a wide range of products including nonstick cookware, stains and water repellants, paints, cleaning products, food packaging and firefighting foams. These compounds can easily migrate in air, soil and water and are extremely persistent once in the environment and in the human body. There are studies that indicate potential adverse health impacts associated with PFAS exposure. These factors have contributed to further examination of the extent and impacts of PFAS contamination along with the development of regulations intended to protect public health and the environment.

The Wisconsin Department of Natural Resources (WDNR) recently launched a statewide initiative requesting wastewater treatment plants across the state to identify potential sources of PFOA and PFOS within their respective sewer service areas. The goal of this initiative is to gather information, establish sampling protocols, and work to reduce or eliminate the use of these chemicals. The following types of industries are known sources of PFAS compounds (List from the Organization for Economic Cooperation and Development):

- Platers/metal finishers
- Paper and packaging manufacturers
- Tanneries and leather/fabric/carpet treaters
- Manufacturers of parts with PTFE (polytetrafluoroethylene, Teflon type)
- Facilities that manufacture or use coatings
- Centralized waste treaters
- Dairy processing facilities and cheesemakers
- Fire-fighting equipment manufacturer s
- Military bases
- Airports
- Household cleaning product manufacturers
- Facilities that manufacture or use coatings
- Centralized waste treaters

*Where milk supply is sourced from livestock grazing on fields that have received PFAS-contaminated biosolids*

September 10, 2019  
2019 - Request for Information - PFAS Sources

**Requested Action:**

In accordance with the WDNR requested action, the AWWTP is requiring industries to complete the attached survey. The survey should be completed and submitted to my attention by no later than September 30, 2019.

Please let me know if you have any questions.

Thank you,

A handwritten signature in blue ink, appearing to read "Brian J. Kreski".

Brian J. Kreski  
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Encl: PFAS Survey

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## Electroplaters/metal finishers/circuit board manufacturers

PFAS-containing chemicals, specifically those containing perfluorooctane sulfonate (PFOS) were used by electroplaters as a demister/defoamer/surfactant to control air emissions of hexavalent chromium beginning in the mid-1990s. While hard chrome and decorative chrome platers using hexavalent chrome are the most likely sources, PFAS have also been found in wetting agents and other plating chemicals involving other metals and plastics. Even if used many years ago, PFAS-containing chemicals may persist in plating tanks, etch tanks, sumps, air emission control systems and secondary containment pits. Some chemicals identified as PFOS-free may still contain PFAS. We are still learning about the behavior of these chemicals, and there are concerns that chemical changes may occur in plating and etch baths. Platers in Michigan and Minnesota were found to have PFOS contamination in their wastewater years after they discontinued use of PFOS-containing chemicals.

1. What types of plating are currently performed at your facility?
2. What types of plating were previously performed at your facility? Please summarize the plating activities over the last 20 years if possible.
3. Are or were demisters/defoamers/surfactants used to control air emissions or as wetting agents for any plating or etch tanks? If so, what are the names of the chemicals and amounts and concentrations used? Please provide the SDS/MSDS sheets for these chemicals.
4. Are or were demisters/defoamers/surfactants used to control air emissions or as wetting agents for any plating or etch tanks? If so, what are the names of the chemicals and amounts and concentrations used? Please provide the SDS/MSDS sheets for these chemicals.
5. Are any other chemicals used in the plating processes known to contain PFAS or PFOS? If so, what are the names of the chemicals and amounts and concentrations used? Please provide the SDS/MSDS sheets for these chemicals and a schematic or flow diagram that shows where each chemical is used.
6. Are there any other fluorinated chemicals used (look for “fluoro” in the SDS/MSDS chemical listing or product name, e.g., “fluorinated surfactant(s)” or “organic fluorosulfonate”)? If so, what are the names of the chemicals and amounts and concentrations used? Please provide the SDS/MSDS sheets for these chemicals and a description of where they are used in your process.

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## Industry sites with soil or groundwater contamination including those where aqueous film forming foam (AFFF) was used:

If your industry or facility has soil or groundwater contamination due to releases of industrial wastes or the use of AFFF (Class B) firefighting foam due to fires or firefighter training that discharges or infiltrates into the sanitary sewers may be a concern.

1. Do you currently have contamination of soil or groundwater due to releases from electroplating/metal finishing processes, the coating/treatment of paper or packaging products, textile, leather or fabric treating, leather tanning operations, the manufacturing of PTFE coatings or other PFAS sources? Please describe below.
2. Has your facility had a fire in which AFFF (Class B) foam was utilized, or has firefighter training occurred on your site using AFFF foam? Please describe below.
3. Have you analyzed your groundwater for PFAS? If so, please provide the results.
4. Do you have a groundwater cleanup or investigation? Please describe.

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## Industries using PFAS in other processes and operations.

If you are aware of the use of chemicals containing PFAS in your processes or operations please answer the questions below.

1. What are the names of the chemicals containing PFAS? Please provide the amounts and concentrations used? Please provide the SDS/MSDS sheets for the PFAS containing chemicals. In answering this question, please review your manufacturing operations over the last 20 years if possible.
  
2. Are there any other fluorinated chemicals used (look for “fluoro” in the SDS/MSDS chemical listing or product name, e.g., “fluorinated surfactant(s)” or “organic fluorosulfonate”)? If so, what are the names of the chemicals and amounts and concentrations used? Please provide the SDS/MSDS sheets for these chemicals.