

From: Henderson, Dave <Dave.Henderson@aecom.com>
Sent: Wednesday, August 7, 2019 10:13 AM
To: Beggs, Tauren R - DNR; GravelPit
Cc: Chronert, Roxanne N - DNR; Kasdorf, James H Jr - DNR
Subject: RE: PFAS Compilation of Information

Thank you kind sir.

dsh

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From: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>
Sent: Wednesday, August 07, 2019 8:49 AM
To: GravelPit <GravelPit@manitowoc.org>; Henderson, Dave <Dave.Henderson@aecom.com>
Cc: Chronert, Roxanne N - DNR <Roxanne.Chronert@wisconsin.gov>; Kasdorf, James H Jr - DNR <James.KasdorfJr@wisconsin.gov>
Subject: PFAS Compilation of Information

Good morning,

Based on our last meeting we had on July 9, 2019, there were many questions about PFAS regarding: communication to homeowners, recommended responses when PFAS is identified, how to limit exposure, regulations (investigation and cleanup), etc. In order to provide more detailed PFAS information, I worked with multiple DNR staff/programs to compile information that is available into one document (attached).

If you have additional questions after review of this information, I can work with DNR staff to help provide answers.

Regards,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Tauren R. Beggs

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PFAS Compilation of Information for the City of Manitowoc
August 7, 2019

DNR Legal Authority for Regulating PFAS:

PFAS meet the definition of a “hazardous substance” found in Wis. Stats. §§ 292.01(5) and 299.01(6). Therefore, a discharge of PFAS can be regulated under Wis. Stat. § 292.11 (the “spills law”) and an investigation and cleanup can be initiated under Wis. Admin. Code chs. NR 700 rule series.

DNR PFAS Webpage:

<https://dnr.wi.gov/topic/Contaminants/PFAS.html>

DNR PFAS Contamination in the Marinette and Peshtigo Area Webpage:

<https://dnr.wi.gov/topic/Contaminants/Marinette.html>

Marinette and Peshtigo Frequently Asked Questions (FAQ):

<https://dnr.wi.gov/topic/Contaminants/MarinetteFAQ.html>

- The FAQ has Marinette/Peshtigo area specific questions, but many of the FAQs relate to general PFAS concerns.
- FAQs of note:
 - Notes that for private wells with PFAS detects, consider bottled water and/or granular activated carbon (GAC) Point of Entry Treatment (POET) systems.
 - It is not a practice of the DNR to recommend specific laboratories. However, DNR offers the following questions to ask when finding an appropriate laboratory:
 - Is the lab following [EPA 537.1 methodology](#) for the analysis of drinking water for PFAS?
 - How many drinking water samples has the lab analyzed using EPA 537.1? Generally, more is better.
 - How many PFAS drinking water certifications does the lab currently hold and from who? Generally, more is better.

DNR Presentation for July 10, 2019 Marinette and Peshtigo Area Public Meeting:

<https://dnr.wi.gov/topic/contaminants/documents/pfas/Presentation20190710.pdf>

- Most recent actions for Marinette Tyco Fire Technology Center Site including investigation, interim actions, and proposed drinking water solutions.
- Explanation of DNR’s Permanent Administrative Rule Promulgation Procedure.
- DHS work on PFAS and their next steps.
- Community Resources.

DNR Non-Industrial and Industrial Direct Contact Standards for PFOA and PFOS in Soil:

Refer to DNR’s Soil RCL Spreadsheet at the DNR Webpage:

<https://dnr.wi.gov/topic/brownfields/soil.html>

- Currently, there is no established soil to groundwater pathway residual contaminant level (RCL); however, due to the characteristics of PFAS, a future RCL would likely be low as PFAS tends to not sorb to soil and migrates quickly through the subsurface dispersing once it contacts the water table or a surface water body.
- JCI / Tyco will be calculating a site-specific soil to groundwater pathway RCL for their Fire Technology Site in Marinette as part of their site investigation.

DNR Surface Water Standards and WPDES Permitting for Discharges into a Potable Water Source:

- DNR does not currently have enforceable numeric water quality standards for PFAS.
- DNR does currently have narrative authorities that prohibit the discharge of pollutants in amounts toxic to humans; and, under certain circumstances, DNR can impose secondary value limitations for substances that pose a threat to human health or the environment.
- DNR intends to commence rulemaking to adopt surface water quality standards and the DHS-recommended groundwater standard for two of the most common PFAS, PFOA and PFOS, of 20 ng/L combined PFOA and PFOS.
- DNR has requested 125 publicly owned treatment works that receive wastewater from potential PFAS sources throughout the state to monitor influent and effluent for PFAS.

DHS Recommended Groundwater Enforcement Standards for PFOA and PFOS (combined):

<https://www.dhs.wisconsin.gov/water/gws.htm>

- Recommended standards used as guidance until enacted into law.
- Past DNR experience with other recommended groundwater standard changes lead DNR to believe the recommended standards are likely to be approved with minimal or no changes.
- DNR will begin the rulemaking process in Fall 2019 to establish enforcement standards for PFOA and PFOS for groundwater, surface water, and soil. The process may take up to 30 months.

DHS Website for PFAS: <https://www.dhs.wisconsin.gov/chemical/pfas.htm>

- DHS states the major exposure pathway for PFAS getting into our bodies is through ingestion (eating food or drinking water that contains PFAS). Dermal contact with PFAS is not of concern, however, one should wash hands when coming into contact with PFAS-containing media to avoid accidental ingestion.

DHS Surface Water and Dermal Contact Assessment Letter for Tyco Fire Technology Center:

- On BRRTS on the Web (search BRRTS # 02-38-580694, link <https://dnr.wi.gov/botw/GetActivityDetail.do?adn=0238580694&siteId=1552500&crumb=1&search=b>), then click on the PDF titled "20190621_43_DHS_Surface_Water_Assessment.pdf".

Other Resources:

EPA approved laboratories for 537.1 methodology for analysis of drinking water for PFAS:

<https://www.epa.gov/sites/production/files/2016-10/documents/ucmr3-lab-approval.pdf>

Environmental Council of the States PFAS Risk Communication Case Studies:

<https://www.ecos.org/documents/state-level-risk-communication-of-pfas-and-habs/>

Interstate Technology & Regulatory Council (ITRC) Webpage for PFAS:

<https://pfas-1.itrcweb.org/fact-sheets/>

Agency for Toxic Substances and Disease Registry (ATSDR) Webpage for PFAS:

Provides detailed information for the general public on health effects of PFAS.

<https://www.atsdr.cdc.gov/pfas/PFAS-health-effects.html>