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Sent: Friday, February 24, 2023 8:16 AM
To: Sieger, Christine T - DNR
Cc: Nobile, Trevor W - DNR; Beggs, Tauren R - DNR; Irving, Roy M - DHS
Subject: Mirro #2 - lifting drinking water advisories letter
Attachments: Mirro2_Advisory_20230224_Final.pdf

Hi, Christine.

Please see attached for our letter regarding the drinking water advisories in the private wells around former Mirro Plant #2 in Manitowoc. Please reach out if you have any questions.

Thanks,
Nathan

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2/23/2023

Christine Sieger
Bureau Director
Remediation and Redevelopment Program
Department of Natural Resources

Re: Lifting of drinking water advisories around former Mirro Company Plant #2 in Manitowoc

Dear Ms. Sieger,

The Wisconsin Department of Health Services (DHS) recently received notice from the Wisconsin Department of Natural Resources (DNR) and Ramboll of the third round of sampling conducted at four addresses near the former Mirro Company Plant #2 in Manitowoc. These updated results indicate that per- and polyfluoroalkyl substances (PFAS) levels do not appear at a level of concern in the groundwater at this time, and, as such, **DHS supports rescinding the drinking water advisory and ceasing bottled water service at the impacted addresses (2519 Woodland Dr & 2722 Woodland Dr), so long as follow-up sampling and a long-term monitoring plan is established.**

Background

In November of 2021, DNR notified DHS of PFAS detections in the groundwater at the former Mirro Company Plant #2, located at 2009 Mirro Drive, Manitowoc, Wisconsin. PFOA levels in 15 of 17 on-site monitoring wells exceeded DHS' recommended groundwater enforcement standard.¹ DNR identified seven properties in the immediate area with private wells, which were reached out to for sampling. This letter relates to these off-site private wells.

Sampling Data

Four of seven private wells in the vicinity of the site agreed to access and were sampled for PFAS in December of 2021. No PFOA exceedances were identified in any of these wells, but PFOSA, a PFOS precursor, was detected in two wells (2519 Woodland Dr & 2722 Woodland Dr) at levels above recommended groundwater enforcement standard. Following this sampling event, emergency and temporary water was provided to the two homes with exceedances per DHS and DNR agreement for the need of a drinking water advisory.

Follow-up samples were taken in July and August 2022 at the four homes. In these samples, no PFAS were detected at 2519 Woodland, and all results at 2722 Woodland were J-flagged, below the level of quantification (LOQ). In response to this, another round of sampling was conducted in November 2022 and yielded similar results: no detects at 2519 Woodland and levels near LOQ at 2722 Woodland. A summary of these results is provided in Table 1.

¹ DHS recommends a combined standard of 20 ng/L for PFOA, PFOS, FOSA, NEtFOSA, NEtFOSAA, and NEtFOSE. See <https://dhs.wisconsin.gov/publications/p02434v-2.pdf> and <https://dhs.wisconsin.gov/publications/p02807.pdf>

Scientific Evaluation

All sample results from July/August and November 2022 indicate that PFAS levels are below DHS-recommended groundwater enforcement standards. These two subsequent sampling events indicate that either the groundwater plume has shifted or that the first round of sample results was an anomaly due to laboratory or sampling procedures.

Limitations and Uncertainties

Each of these samples only represent a snapshot in time at the point of sampling, and as such can only be used to evaluate the environmental conditions of the site at that point in time.

Conclusions

Current data indicate that the potential health risk is low at this time. Two rounds of sampling events have indicated that PFAS levels are currently below DHS recommended groundwater standards. At this time, we would not expect there to be exposure to PFAS in drinking water at levels that would cause adverse health effects.

Recommendations

As we do not believe PFAS poses a health hazard at this time, DHS recommends lifting the drinking water advisory issued in December 2021. At this time, we do not have concerns about using the water from these wells for drinking and food preparation. We recommend that the two homes with previous exceedances be sampled at least twice a year to ensure levels remain low. If future sampling shows PFAS levels above DHS' recommended groundwater standards, we recommend reinstating the drinking water advisory and ensuring an alternative water supply is provided to any impacted homes. This alternative supply can be an in-house filtration system certified to remove PFAS with adequate support for a filter supply, or a sustained bottled water service.

If there are any questions, please reach out to me at nathan.kloczko@dhs.wisconsin.gov or 608.267.3227.

Regards,



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CC: Tauren Beggs, Hydrogeologist, WI DNR
Trevor Nobile, Field Operations Director, WI DNR

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Table 1. PFAS detections in private drinking water wells near the site.

Contaminant	PFOSA	PFOA	PFOS	PFBS
Recommended Standard	20*			450,000
December 2021 Sampling				
1750 Mirro Dr	9.08	-	-	-
2519 Woodland Dr	21.1	-	-	-
2722 Woodland Dr	106	0.942J	-	-
3104 Woodland Dr	11.5	-	-	-
July/August 2022 Sampling				
1750 Mirro Dr	-	-	-	-
2519 Woodland Dr	-	-	-	-
2722 Woodland Dr	0.426J	1.3J	0.649J	0.29J
3104 Woodland Dr	0.437	-	-	-
November 2022 Sampling				
1750 Mirro Dr	-	-	-	-
2519 Woodland Dr	-	-	-	-
2722 Woodland Dr	-	1.8	-	0.35
3104 Woodland Dr	-	-	-	-

All measurements in parts per trillion (ppt). Dashes indicate non-detection. Bold results indicate recommended standard exceedances.

*DHS recommends a combined standard of 20 ppt for PFOA, PFOS, PFOSA, NEtFOSA, NEtFOSAA, and NEtFOSE.