



April 3, 2025

MS. DENICE NELSON
JOHNSON CONTROLS, INC
5757 N. GREEN BAY AVENUE
MILWAUKEE, WI 53209

Via Email Only to denice.karen.nelson@jci.com

SUBJECT: Updated Health Guidelines for PFAS in Drinking Water
Request to Evaluate Private Well Test Results and Offer Alternative Water
BRRTS Nos. 02-38-580694 and 02-38-583856

Dear Ms. Nelson:

In February 2025, the Wisconsin Department of Health Services (DHS) updated its health-based guidelines for per- and polyfluoroalkyl substances (PFAS) in drinking water and provided the Wisconsin Department of Natural Resources (DNR) with the Cycle 12 recommended groundwater standards for six PFAS.

Drinking water advisories may be issued for private wells when a contaminant level meets or exceeds a DHS health advisory level or the hazard index is equal to or greater than 1.0. The DHS's current health advisory levels for 18 PFAS compounds and its updated hazard index equation for PFAS are attached.

Please use the DHS's current guidelines when reporting PFAS results to private well users. Also, please review the PFAS testing results for private wells that Johnson Controls, Inc. and Tyco Fire Products LP (JCI/Tyco) has sampled in the Marinette-Peshtigo area and identify locations where PFAS concentrations meet or exceed any of DHS's current health advisory levels or have a hazard index equal to or greater than 1.0. For these locations:

- If the property is not receiving alternative drinking water from JCI/Tyco, please contact the property owner to explain the change in the evaluation for their well and offer to provide them with an alternative supply of drinking water.
- If the property is in the Potable Wells Sampling Area (PWSA) and they do not have a point-of-entry treatment (POET) system or they have not signed an agreement to receive a new deep well, please contact the property owner to explain the change in the evaluation for their well and offer to provide a POET or new deep well.

Please submit documentation for each BRRTS case within 60 days of date of this letter that summarizes the findings of the data evaluation, outreach made to applicable property owners and outcome for providing alternative water to these properties. Prior to outreach with affected properties, we request that JCI/Tyco share its outreach communication template(s) with the DNR, to establish concurrence on messaging.

If you have any questions, please contact me at Alyssa.Sellwood@wisconsin.gov or (608) 622-8606.

Sincerely,

Alyssa Sellwood, PE
Water Resources Engineer
Remediation & Redevelopment Program

Attachment: DHS Recommended PFAS Health Advisories and Hazard Index Equation

cc: Jodie Thistle & Kyle Burton - DNR (via email: jodie.thistle@wisconsin.gov; kyle.burton@wisconsin.gov)

Table 1. DHS Recommended PFAS Enforcement Standards and Health Advisories from Cycle 11 (2020) and Cycle 12 (2025).

| PFAS Compound | Cycle 11 | Cycle 12 |
|------------------------|----------|----------------------|
| PFOA | | 4 ⁽ⁱⁱ⁾ |
| PFOS | | 4 ⁽ⁱⁱ⁾ |
| NEtFOSE | 20 | (4) ⁽ⁱⁱⁱ⁾ |
| NEtFOSAA | | (4) ⁽ⁱⁱⁱ⁾ |
| NEtFOSA | | (4) ⁽ⁱⁱⁱ⁾ |
| FOSA | | (4) ⁽ⁱⁱⁱ⁾ |
| PFBS | 450,000 | 2,000 |
| PFBA | 10,000 | 10,000 |
| PFDA | 300 | 300 |
| PFDoA | 500 | 500 |
| PFHxS | 40 | 10 |
| PFHxA | 150,000 | 150,000 |
| PFNA | 30 | 10 |
| PFODA | 400,000 | 400,000 |
| PFTeA | 10,000 | 10,000 |
| PFUnA | 3,000 | 3,000 |
| HFPO-DA ⁽ⁱ⁾ | 300 | 10 |
| DONA | 3,000 | 3,000 |

Values are shown in nanograms per liter (ng/L).

⁽ⁱ⁾ GenX is the trade name for HFPO-DA.

⁽ⁱⁱ⁾ Cycle 12 PFOA and PFOS recommendations apply individually and no longer include the four precursor compounds. These recommendations are not included as part of the updated DHS PFAS Hazard Index.

⁽ⁱⁱⁱ⁾ DHS established individual health advisories for the four precursor PFAS, which are based on the maximum contaminant level for PFOA.

Highlighted rows indicate the PFAS that DHS reviewed as part of the Cycle 12 groundwater standard process.

DHS' 2025 PFAS Hazard Index Equation

$$\text{Hazard Index} = \text{HQ}_{\text{HFPO-DA}} + \text{HQ}_{\text{PFBS}} + \text{HQ}_{\text{PFHxS}} + \text{HQ}_{\text{PFNA}} + \text{HQ}_{\text{DONA}} + \text{HQ}_{\text{PFBA}} + \text{HQ}_{\text{PFDA}} + \text{HQ}_{\text{PFDoA}} + \text{HQ}_{\text{PFHxA}} + \text{HQ}_{\text{PFODA}} + \text{HQ}_{\text{PFTeA}} + \text{HQ}_{\text{PFUnA}}$$

Where:

$$\text{HQ} = \frac{\text{PFAS}_x \text{ Concentration}}{\text{PFAS}_x \text{ Health Guideline}}$$

Note: Table 1 and the 2025 Hazard Index Equation provided to the DNR from the DHS on February 19, 2025.