

Appendix C: Public Advisory Group Gap Analysis

Additional Actions Proposed by External Advisory Groups

While the majority of the actions proposed by the two external advisory groups (citizens/public policy and local government) were either similar (see sections on action papers titled "This action addresses input received from:") or were related to (see sections on action papers titled "Additional information.") components of actions proposed by WisPAC, the following actions proposed through the external advisory groups were not significantly related to any of those actions:

Local Government Advisory Group

- Recommended that the State of Wisconsin require a licensing program for fire departments that includes a requirement to maintain an inventory of PFAS foam and also require that fire departments contract for clean-up and disposal at areas where PFAS is discharged. Discharges that occur as the result of Class B (flammable liquid) fires would be exempt from these contracting requirements.

Citizens/Public Policy Advisory Group

- Consider opportunities for municipalities to exercise emergency powers to address specific concerns.
- There should be clearer guidance regarding when state government or an RP should be liable for addressing historical/legacy discharges
- Provide guidance on how PFAS liability will be managed in Voluntary Party Liability Exemption (VPLE) cleanups.
- Identify what to do with PFAS-impacted building materials & cleanup residue.
- Address gap that exists because PFAS is not currently a CERCLA hazardous substance and thus outside of the scope of a traditional ASTM Phase I Environmental Site Assessment.

The full reports submitted by the external advisory groups can be found in Appendix C and D