

**Wisconsin Department of Natural Resources
Natural Resources Board Agenda Item**

Amended on June 14, 2021 to include summary of written comments.

SUBJECT:

Request that the Board approve the Statement of Scope for Board Order DG-31-20 and conditionally approve the public hearing notice and notice of submittal of proposed rules to the Legislative Council Rules Clearinghouse, for proposed rules affecting chapter NR 809 related to the promulgation of new drinking water maximum contaminant levels for 12 additional Per- and Polyfluoroalkyl Substances (PFAS) and combined standards for 4 PFAS.

FOR: June 2021 Board meeting

PRESENTER'S NAME AND TITLE: Steve B. Elmore, Drinking Water and Groundwater Program Director

SUMMARY:

The objective of the proposed rule is to amend ch. NR 809, Wis. Adm. Code, to establish drinking water standards, referred to as Maximum Contaminant Levels (MCLs), for 12 Per- and Polyfluoroalkyl substances (PFAS) and combined standards for 4 PFAS. Establishment of these MCLs is based on recommendations for health-based standards from the Department of Health Services (DHS) based on its review of scientifically valid technical information. On November 6, 2020, DHS transmitted the 11th Cycle of Groundwater Standards Proposals to DNR containing recommendations to establish groundwater standards for 22 substances including individual standards for 6 pesticides, individual standards for 12 per- and polyfluoroalkyl substances (PFAS), and combined standards for 4 PFAS.

A preliminary public hearing on this scope statement was held on June 4, 2021. A recording of the hearing is available at: <https://widnr.widen.net/s/v27nsc1bw>. The deadline for comments was June 10, 2021. Written comments are attached.

If the scope statement for DG-31-20 is approved, the department may begin drafting the rule language. As required by statute, the department may not begin work on the content of the proposed rule until the scope statement is approved. Once the rule is drafted, the department will seek public comment on the economic impact of the rule and on the proposed rule language. The 30-month time frame for submission of a final rule to the legislature for approval expires on September 15, 2023.

RECOMMENDATION: That the Board approve the Statement of Scope for Board Order DG-31-20 and conditionally approve the public hearing notice and notice of submittal of proposed rules to the Legislative Council Rules Clearinghouse.

LIST OF ATTACHED MATERIALS (check all that are applicable):

- Statement of scope Background memo and written comments
 Governor approval of statement of scope

Approved by	Signature	Date
Steven B. Elmore, Drinking Water and Groundwater Program Director		6/15/2021 10:36 AM CDT
Darsi J. Foss, Environmental Management Division Administrator		6/15/2021 11:01 AM CDT
Preston D. Cole, Secretary		6/15/2021 12:00 PM CDT

for

by Todd Ambs

cc: Board Liaison - AD/8

DS


Program attorney – LS/8

Department rule officer – LS/8

CORRESPONDENCE/MEMORANDUM

DATE: June 14, 2021

TO: All Members of the Natural Resources Board

FROM: Preston D. Cole, Secretary

SUBJECT: Background memo on preliminary public hearing and public comments received on the scope statement for Board Order DG-31-20, revisions to ch. NR 809 related to the promulgation of new drinking water maximum contaminant levels for 12 additional Per- and Polyfluoroalkyl Substances (PFAS) and combined standards for 4 PFAS..

On March 17, 2021, the co-chair of the Joint Committee for the Review of Administrative Rules (JCRAR) requested that the Department hold a preliminary public hearing and comment period on the scope statement for Board Order DG-31-20, pursuant to s. 227.136(1), Wis. Stats. The statement of scope contemplates rulemaking to revise chapter NR 809 related to the promulgation of new drinking water maximum contaminant levels for 12 additional Per- and Polyfluoroalkyl Substances (PFAS) and combined standards for 4 PFAS.

Public Hearing

The Department held an online preliminary public hearing on the statement of scope for Board Order DG-31-20 along with another related scope statement, DG-25-20, on June 4, 2021.

Fifty-five members of the public attended the preliminary public hearing. Eight members of the public provided verbal testimony at the hearing.

Comments included seven members of the public in support and one member in opposition. Topics in favor centered on the need to protect public health and the economic necessity of making sure Wisconsin products like beer, cheese, agriculture (cows) have clean water. The Tyco firefighting foam area of groundwater contamination was also referenced as an example of groundwater contamination that negatively affects public health, especially children. One commenter expressed concerns that the scope statements are unlawfully vague without adequate descriptions of policy and questioned the scientific studies used by the Department of Health Services.

A video recording of the preliminary public hearing is available at: <https://widnr.widen.net/s/v27nsc1bw>

Written Public Comments

The public comment period ended on June 10, 2021. Written comments are attached. The department received written comments in the following categories:

Support

- Clean water is an inherent right.
- PFAS contamination is widespread and harmful to human health.
- Other states are adopting standards and Wisconsin is behind.
- The research supports the proposed standards.
- It is important not to wait on the EPA to develop standards as that will take too long.
- Without regulation there is no way to ensure safe water.
- The process does meet the statutory requirements

Oppose

- The DNR should wait to propose PFAS MCLs when EPA promulgates PFAS MCLs
- No statutory or regulatory authority explicitly permits the Department to establish a state drinking water standard in the absence of a federal drinking water standard
- Scope statements did not include a “clear” description of new policies included under the proposed rules. They were “unlawfully vague.”
- The Department of Health Services recommendations have not been peer reviewed.
- The combined PFAS groundwater and drinking water standards (hazard index), as suggested in the scope statements, were not lawful.
- DNR should modify standards when economic and scientific data are presented by regulated community

Drafter: Adam DeWeese

The department held an online preliminary public hearing on June 4, 2021 on the statement of scope for Board Order DG-25-20 and the Statement of Scope for Board Order DG-31-20. Written comments on the Statements of Scope were accepted through June 10, 2021. Written comments received by the department on the Statements of Scope for Board Order DG-25-20 and Board Order DG-31-20 are included below.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Lissa McLaughlin
3453 Hargrove Street
Madison, WI 53714
mclaughlimage@gmail.com
(608) 246-0106

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

John Herbst
2604 Fairfield Place
Madison, WI 53704
jmherbst76@gmail.com
(608) 284-1287

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for

cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Samantha Clausen-Ruppert
3732 Sargent Street
Madison, WI 53714
samiclausen@gmail.com
(815) 298-4848

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Sherry Holcomb
1918 Sheridan St.

Madison, WI 53704
petite_renarde@hotmail.com
(608) 239-2417

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Hannah Lee
3834 Whitman Lane, Apt. 312
Madison, WI 53704
casaelmilagro@gmail.com
(608) 588-7365

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Frederick Trost
2812 Windepoint Ct.
Sheboygan, WI 53083
fredericktrost@gmail.com
(608) 239-3827

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Nancy Kendall
1809 Van Hise Ave
Madison, WI 53726
nkendall@gmail.com
(608) 692-0749

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

ciel ishatova
4704 winnequah road
monona, WI 53716
ishatova@chartermi.net
(608) 221-4805

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Jean Krieg
532 Woodward Drive
Madison, WI 53704
jeanbean.krieg@gmail.com
(608) 658-9190

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Danae Steele
428 9th St.
NEENAH, WI 54956
noheaecs@gmail.com
(920) 217-3049

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all

PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Gary Overby
1112 Buena Vista Dr
Sun Prairie, WI 53590
moto714man@yahoo.com
(720) 621-7085

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we

want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

irene piersma
2314 hoard street
irene, WI 53704
piersma@charter.net
(608) 280-0851

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

DAVID ORTIZ
7619 W Norwood Ln
Franklin, WI 53132
mainecon2@sbcglobal.net
(414) 529-3524

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Hannah Mortensen
341 West 4th Street
Oconomowoc, WI 53066
hmfisher10@gmail.com
(319) 327-1020

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Orit Vardi Tragash
529 Orchard Dr
Madison, WI 53711
orit.vardi@gmail.com
(608) 335-9298

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for

cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Sally Drew
333 West Main Street
Madison, WI 53703
sally_drew@mac.com
(608) 251-3406

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Aleks Kosowicz
1745 Roberts Ln

Abrams, WI 54101
guerillawordfare@yahoo.com
(920) 826-5678

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Helen Findley
6225 Mineral Point Rd Apt C61
Madison, WI 53705
hcfindley@gmail.com
(608) 230-3054

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

John Evenson
556 Gately Ter
Madison, WI 53711
jevenson@sbcglobal.net
(608) 358-2230

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Zach Yiannias
14950 Walters Court
Elm Grove, WI 53122
zachyiannias24@gmail.com
(262) 777-0151

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Maureen McCoy
37 Hickory Hollow Dr
Madison, WI 53705
maureenamccoy@gmail.com
(352) 425-2326

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Jessica Boll
2783 Gateway Ave, Apt 6
Hartford, WI 53027
jboll262@gmail.com
(262) 408-1840

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Nicolas Humphrey
2685 Ravine Way
Green Bay, WI 54301
nick.humphrey@snc.edu
(920) 764-0119

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all

PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Aleasa Crary
313 Pawling st
Madison, WI 53704
aleasaabrams@yahoo.com
(608) 770-9087

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we

want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Kaye Johnston
W4240 State Rd 33
La Crosse, WI 54601
kljohnst6@gmail.com
(608) 787-6033

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Michelle Mau
530 Clemons Avenue #2
MADISON, WI 53704
ellehcim79@yahoo.com
(310) 694-2576

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Elyssa Emrich
N5590 N Wilson Lake Circle
Wild Rose, WI 54984
eamrich@uwalumni.com
(920) 319-1028

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Terry Gunning
107 Sutherland Ct., 225
Madison, WI 53704
tgun@chorus.net
(608) 320-0717

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for

cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

David Fallow
102 Leon
Madison, WI 53714
dfallow@yahoo.com
(608) 243-1019

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Patricia Patterson
1911 Kendall Ave

Patricia, WI 53726
patterson99@ameritech.net
(608) 213-4926

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Julie Granstrom
2929 Hermina St
Madison, WI 53704
granstromjulie@gmail.com
(608) 698-3532

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Christine Verdico
156 Talmadge St
Madison, WI 53704
verdi2k@yahoo.com
(608) 205-7922

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Leigh Begalske
1823 Fiesta Ln
Green Bay, WI 54302
anriliselle@yahoo.com
(920) 857-0000

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

guy somers
1427 Spaight Street
guy, WI 53703
4gsomers@gmail.com
(608) 257-7721

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Tehmina Islam
2809 Commercial Ave, Madison
Madison, WI 53704
tehmina.islam@gmail.com
(608) 251-0776

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Masaru Oka
301 s yellowstone dr, apt 115
Madison, WI 53705
naturally.crunk.llove@gmail.com
(281) 658-8591

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all

PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Merrilyn Trombly
830 Hummingbird Court
Sun Prairie, WI 53590
merritrom@gmail.com
(608) 345-2359

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we

want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Emily St. Onge
525 E Main St
Madison, WI 53703
eeestonge3@gmail.com
(414) 839-6356

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Karolyn Beebe
220 Merry Street
Madison, WI 53704
keedo70@gmail.com
(608) 246-0222

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Joshua Rockley
1621 S. 77th St.
West Allis, WI 53214
joshuarockley@gmail.com
(414) 530-3059

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Timothy Kruser
4717 Tonyawatha Trail
Monona, WI 53716
tjkruser@gmail.com
(608) 213-6421

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for

cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Shawn Schey
878 Woodrow St
Madison, WI 53711
shawnschey@yahoo.com
(608) 852-6876

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Steve Books
625 Spruce St.

Madison, WI 53715
books24u@aol.com
(608) 358-7906

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Susan Michetti
605 Sheila St.
Mount Horeb, WI 53572
sunlightrising@gmail.com
(608) 334-3515

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Jonee Graef
159 maize street
Clintonville, WI 54929
graefjonee@gmail.com
(715) 460-5161

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Jadine Sonoda
23 S 2nd Street
Madison, WI 53704
jadine.sonoda@sierraclub.org
(240) 355-8391

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Lscoville <lscoville@countrysspeed.com>

WATER IS LIFE. PURE WATER IS CRUCIAL; TO HEALTH. THAT SHOULD BE OBVIOUS TO EVERYONE. NO EXCUSES. NO CHEMICALS FROM ANY SOURCE. NO PASSING THE COSTS TO THE PEOPLE WHO SUFFER THE CONSEQUENCES WHILE ENRICHING THE ONES WHO CAUSE THIS POLLUTION.

--

This email has been checked for viruses by Avast antivirus software.
<https://www.avast.com/antivirus>

.....
Charlene Beals <cbeals@boardmanclark.com>

Attached are the Municipal Environmental Group - Water Divisions Comments on Statement of Scope for DG-31-20.



P.O. Box 927
Madison, WI 53701-0927
Telephone (608) 283-1788
Facsimile (608) 283-1709

June 3, 2021

Filed Via Email
Adam.DeWeese@wisconsin.gov
DNRAAdministrativeRulesComments@wisconsin.gov

Department of Natural Resources
Attn: Adam DeWeese - DG/5
P.O. Box 7921
101 S. Webster Street
Madison, WI 53707-7921

**RE: Comments on Statement of Scope for DG-31-20
Revisions to ch. NR 809 related to the promulgation of new drinking water MCLs
for 12 additional PFAS and combined standards for 4 PFAS**

Dear Mr. DeWeese:

These comments are filed on behalf of the Municipal Environmental Group - Water Division (MEG - Water). MEG - Water is an association of 69 municipal water systems that provides input on legislative and regulatory issues involving water supply.

The Department has released a Statement of Scope for Rulemaking No. DG-31-20 which would revise ch. NR 809 and add new drinking water maximum contaminant levels (MCLs) for 12 additional PFAS and combined standards for 4 PFAS. This proposed rulemaking is in addition to the Department's current rulemaking (Rule No. DG-24-19) which proposes to revise ch. NR 809 to add new drinking water MCLs for perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS). Both of these rulemakings address PFAS contaminants that are identified as emerging contaminants.

It is MEG - Water's understanding that up until now all drinking water MCLs included in ch. NR 809 have been first established by EPA pursuant to the federal Safe Drinking Water Act (SDWA). Wisconsin has never before adopted a drinking water MCL before a federal drinking water MCL was in place.

MEG - Water supports continuing that precedent and waiting to revise NR 809 until after EPA establishes federal drinking water standards for PFAS using the SDWA standard-setting process. EPA has made it clear that it is moving ahead to regulate PFAS in drinking water. On March 3, 2021, EPA published its final regulatory determination to regulate PFOA and PFOS under the SDWA. In addition, in that final determination, EPA committed to making regulatory determinations for additional PFAS in advance of the next SDWA deadline. EPA stated that:

Department of Natural Resources
June 3, 2021
Page 2

although SDWA does not require the Agency to complete regulatory determinations for the contaminants from the fifth CCL until 2026, because of the significant progress related to developing new high-quality PFAS information, combined with the Agency's commitment in the PFAS Action Plan to assist states and communities with PFAS contaminated drinking water, EPA will continue to prioritize regulatory determinations of additional PFAS in drinking water. The Agency is committing to making regulatory determinations in advance of the next SDWA deadline for additional PFAS for which the Agency has a peer reviewed health assessment, has nationally representative occurrence data in finished drinking water, and has sufficient information to determine whether there is a meaningful opportunity for health risk reduction for persons served by public water systems.

86 F.R. 12278-12279.

MEG - Water asks the Department to wait for EPA to promulgate federal drinking water MCLs before proceeding to adopt state standards. When EPA promulgates federal drinking water

standards, EPA follows the SDWA standard-setting process. Under the SDWA standard-setting process, a health goal is set that considers risks to the most sensitive populations including infants, pregnant women, and the immuno-compromised. The next step sets the enforcement standard (the MCL) to be as close to the health goal as feasible, considering available treatment technologies and costs. This cost-benefit analysis is a critical component of the SDWA standard-setting process.

Under the SDWA standard-setting process, drinking water standards are not set at the lowest possible level regardless of cost, treatment feasibility, and relative health benefits. The SDWA cost-benefit analysis provides assurance that the health benefits achieved by a new standard justifies the cost of meeting that standard, and that comparable health benefits could not be achieved with a higher standard that would be less costly to meet.

It appears from the Statement of Scope (and the Department's actions on Rule No. DG-24-19) that the Department will not be following the SDWA standard-setting process when it proceeds to set state standards for PFAS. Instead the Department will seek to promulgate state drinking water standards based on the Wisconsin Department of Health Services' proposed groundwater standards without conducting a cost-benefit analysis of the proposed state standards. The Department will not be considering whether comparable health benefits could be achieved with a higher standard and a lower cost.

MEG - Water is concerned with the Department's intent to establish drinking water standards without weighing the relative costs and benefits of those standards and the precedent that this may set for establishing future state drinking water standards for other emerging contaminants. MEG - Water questions the Department's authority to establish state drinking water standards in this way. While Wis. Stat. § 281.17(8)(a) provides that "the department may establish, administer and maintain a safe drinking water program no less stringent than the requirements of the safe drinking water act, 42 USC 300f to 300j-26," this subsection does not provide

permission for the Department to set state drinking water standards where there is no comparable federal drinking water standard.

Under Wis. Stat. § 227.10(2m) an agency is prohibited from implementing any standard unless that standard “is explicitly required or explicitly permitted by statute or by a rule.” To MEG - Water’s knowledge, no statutory or regulatory authority explicitly permits the Department to establish a state drinking water standard in the absence of a federal drinking water standard.

MEG - Water supports the development and implementation of federal PFAS MCLs using the SDWA rulemaking process. MEG - Water also supports the Department’s efforts to obtain additional information about the presence of PFAS in Wisconsin, to provide public information about PFAS, and to encourage action where PFAS levels are elevated. But MEG - Water does not support establishing state PFAS standards in a manner that is inconsistent with the SDWA standard-setting process and that does not consider the relative costs and benefits of the proposed standards.

Public water systems are charged with protecting public health and they take this responsibility extremely seriously. Public water systems currently face a host of expensive challenges to ensure the continued protection of public health -- like eliminating lead service lines, replacing old infrastructure, implementing corrosion control treatment to prevent leaching from lead pipes, and treating for contaminants like radium, arsenic, and nitrate. At the same time, there are concerns about public water supply remaining affordable.

As we respond to emerging contaminants, like PFAS, it is important that these emerging contaminants receive the same scrutiny and analysis as was given to the contaminants that already have MCLs. This is best done by having EPA develop federal drinking water standards for PFAS using the SDWA standard-setting process. If drinking water standards for PFAS are established based upon the same uniform and consistent methodology used to establish standards for other drinking water contaminants, public water systems and the public at large can be assured that PFAS is receiving the attention and resources that it deserves.

Thank you for this opportunity to provide the Department with our additional input. If you have any questions, please do not hesitate to contact us.

Sincerely,

MUNICIPAL ENVIRONMENTAL GROUP – WATER DIVISION



Lawrie J. Kobza Legal
Counsel

cc: MEG - Water Members

\\msnfs2\share\docs\WD\20211\4\A4122097.DOCX

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I’m glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health. Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Edward Mrkvicka
341 Whitewater Ave Uppr Apt
Fort Atkinson, WI 53538
bigkahunao62@yahoo.com
(920) 747-4070

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health. Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Cecile Adams
S77W12929 McShane Dr Apt C209
Muskego, WI 53150
cileadams@aol.com

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

JOHN JOHNSON
522 MCCORMICK AVE
MADISON, WI 53704
j.zach.johnson@gmail.com
(847) 567-3314

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Linda Gottschalk
523 Spinnaker Ln Apt G
Green Bay, WI 54302
lynmarij@yahoo.com
(920) 327-8985

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Joyce Frohn
425 Congress Ave
Oshkosh, WI 54901
ahengst1@new.rr.com
(920) 426-9931

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health. Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Aleks Kosowicz
1745 Roberts Ln
Abrams, WI 54101
guerillawordfare@yahoo.com
(920) 826-5678

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health. Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Jane Shippy
517 Fieldcrest Ave
Stevens Point, WI 54481
jshippy@uwsp.edu
(715) 344-2939

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Cindy Carter
1102 N Superior St
Appleton, WI 54911
cindycat1@sbcglobal.net
(920) 840-6362

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Gary Overby
1112 Buena Vista Dr
Sun Prairie, WI 53590
moto714man@yahoo.com
(720) 621-7085

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Ronda Conner

830 Burr Oak Ln, Address Line 2

MADISON, WI 53713

rondaconner@hotmail.com

(608) 245-3931

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Constance Lorig <connie.lorig@gmail.com>

We need strict standards for PFAS. Thanks much.

.....
Cindy Carter <cindycat1@sbcglobal.net>

It is TIME to regulate and clean up the forever chemicles. We have poisoned our state, our nation, our world with the cancer causing, human and wildlife killing toxins. WE MUST take this on now. Cindy Carter, Appleton

.....
katmc84@gmail.com

Dear Department of Natural Resources Board,

I am urging you to use science based standards to protect our public health from the PFAS/PFOS dangerous chemicals.

I am gravely concerned over the mounting evidence linking PFAS to a long list of negative health effects including: cancer, liver damage, decreased fertility, increased risk of asthma, increased risk of thyroid disease, and growth, learning, and behavior impairment.

I urge you to protect our most vital resource, our water.

Thank you,
Kat Borlaug

.....
Christine Morrissey <merryminion@tds.net>

I am in favor of science based standards and regulations that protect public health from dangerous PFAS chemicals.

Evidence has linked PFAS to numerous negative health effects including: cancer, liver damage, decreased fertility, increased risk of asthma, increased risk of thyroid disease, and growth, learning, and behavior impairment in children. There are dozens of sites known to be contaminated with PFAS in Wisconsin, including the Town of Peshtigo, which is the third most contaminated site in the United States. It is currently unknown how widespread the exposure to these dangerous chemicals might be. There are no federal standards regulating PFAS and until the DNR Board begins this process, there won't be any state standards.

Wisconsin Manufacturers and Commerce (WMC) and the American Chemistry Council (ACC) have been aggressively fighting all efforts to set health standards for pollution, and have fought any efforts to find out what people are being exposed to. They do not speak for the people of our state, they speak only in the best interests of their members.

Protect our water, protect The People, do not protect not the polluters.

Sincerely,
Christine Morrissey
1102 N Union St
Appleton, WI 54911
920-574-2789

.....
District Seven <District.7@greenbaywi.gov>

Good morning members of the Department of Natural Resources Board,

I am writing to you to urge you to set state health standards for toxic PFAS. I am sure you are well aware of the growing evidence linking PFAS to cancer; liver damage; decreased fertility; increased risk of asthma; increased risk of thyroid disease; and growth, learning, and behavior impairment.

Thank you for providing this opportunity for me to share my position on this important issue.

Have a superlative day,
Randy Scannell
Green Bay City Alder

.....
Carolyn and Glen <cgjenks@earthlink.net>

June 3, 2012

Dear Department of Natural Resources Board,
Wisconsinites need safe drinking water that does not contain harmful toxic chemicals like PFAS. I live in La Crosse, Wisconsin on the mighty Mississippi River. The river is no longer mighty but contaminated with PFAS along with municipal wells and private wells. Think about this last statement. La Crosse, Wisconsin is only one slice of the unknown and growing number of communities facing unsafe drinking water across the state. This is Wisconsin not a Third World Country. This is the USA and there is no federal standard set yet after 30 years of researching the PFAS issue. Wisconsin has to move forward on its own, other states done so.

Setting standard for the toxic PFAS chemicals is over due and these standard must stringent and take after the Precautionary Principle of Europe. We know that it is unknown the future health implications of PFAS. We are in the beginning of study and research on PFAS. Breast milk passed on to infants has been proven by cause-and-effect studies to be detrimental. Just in the past year, during COVID there has been reduced immune response from the vaccine on people with high levels of PFAS in their bodies. The signs and signals are on "high alert" and we are only experience the "tip of the iceberg."

Along with not knowing the extent of future health implications we do not even know how pervasive the contamination is because we do not have extensive testing of water sources. Every municipality should be required to test their municipal wells immediately. Private well owners should be required to test their well immediately. Frequently used beaches and water resources should be tested as well.

The standard set needs to be 2 ppt or less for all PFAS. The short chain replacement PFAS are worse for humans and the environment than the legacy PFAS. More testing of municipal wells and private wells need to be mandatory. All humans that have been exposed to PFAS contamination should be required to have their blood levels evaluated so they can take precautionary measures with their health.

Please take the bold necessary steps that other more progressive states have and do the right thing for the PEOPLE of Wisconsin. Set PFAS standards and get testing well and water sources.

Thank you for your time and thank you for allowing citizens to weigh in on such a critical matter as "SAFE DRINKING WATER"

Sincerely,
Carolyn Mahlum-Jenkins

I believe that whenever we destroy beauty, or whenever we substitute something man-made and artificial for a natural feature of the earth, we have retarded some part of man's spiritual growth.

Rachel Carson

.....
Ralph The tiger <ralph.fredrickson1@gmail.com>

These are dangerous toxins which have been carelessly spread throughout our environment. It is your job to regulate these compounds by creating standards for them in aT our sources of water. This must happen now as folks are actively being exposed to these toxins.

.....
Maccrindle, Christine M <christine.m.maccrindle@abbott.com>

I request and strongly recommend that the NRB begins the process of setting standards for these dangerous chemicals and implementation of these standards in a TIMELY manner.

I also request that the resolution not be driven through politics, or industry.

We ALL have a right to clean water and this issue has been ignored for far too long.

Too many lives are at stake, current and future...

Kind Regards,
Chris



Christine MacCrimble, PMP, LSS BB
Principle Quality Solutions Engineer
Post Market Surveillance

Abbott Laboratories
100 Abbott Park Rd.
Bldg CP1
Abbott Park, IL 60064

Office 224-667-3126
Mobile 262-488-2169
Christine.M.MacCrimble@abbott.com



This communication may contain information that is proprietary, confidential, or exempt from disclosure. If you are not the intended recipient, please note that any other dissemination, distribution, use or copying of this communication is strictly prohibited. Anyone who receives this message in error should notify the sender immediately by telephone or by return e-mail and delete it from his or her computer.

.....
Peter KW <peterkasemanwold@gmail.com>

Dear Board Members,

Please take whatever action is available to protect Wisconsin's waters from these pollutants. If forced to change, industry would certainly come up with less toxic alternatives. Society has managed to get along without DDT, leaded gasoline, asbestos tiles, CFC refrigerants, etc. We can and should stop using PFAS as soon as possible.

Peter Kaseman-Wold
4404 Goodland Park Rd, Madison, WI 53711
608-221-1705

.....
mark pass <moishe18us@yahoo.com>

Dear DNR Board,

It is time to set state standards for toxic PFAS chemicals in our ground water and drinking water.

These science based standards will protect our citizens from these dangerous chemicals.

There is mounting evidence linking PFAS to a long list of negative health effects including: cancer, liver damage, decreased fertility, increased risk of asthma, increased risk of thyroid disease, and growth, learning, and behavior impairment.

There are dozens of sites known to be contaminated with PFAS in Wisconsin, including the Town of Peshtigo. It's the third most contaminated site in the United States! But, the truth is, we still don't know how widespread the exposure to these dangerous chemicals might be. There are no federal standards regulating PFAS and currently none in the State of Wisconsin either.

It is time the DNR Board take action!

Thank you for your time & attention to this critical issue.

From a concerned citizen,

Respectfully,
mark pass

.....

Diane Miesbauer <miesbauerd@gmail.com>

I support the DNR working to set state standards for PFAS chemicals. We, the citizens, deserve to know what's in our water and what is a safe level. We deserve it for ourselves as well as our children and our children's children. Just because someone is making money with these chemicals today doesn't mean they can't make money doing it a different way tomorrow. Cleanup and recovery from repercussions from pollution is a whole lot more expensive than preventing it in the first place.

Thanks for taking my comments,
Diane Miesbauer
W270N7534 Oakwood Ct, Hartland, WI 53029
262.367.7449

.....

Ruth Battaglia <rbattaglia@csasisters.org>

To Whom It May Concern:

I support setting standards for toxic PFAS chemicals in our ground water and drinking water in the face of evidence of the harm they do to our health.

We cannot sacrifice the health of our Wisconsin citizens to the benefit of polluters.

Make the rules strong and enforceable. Thank you.

Sincerely,

Sister Ruth Battaglia CSA
330 County Rd K
Fond du Lac, WI 54937
920 907 2815

.....

Terrence Gerlach <porph@hotmail.com>

As a survivor of colon cancer, I am concerned about mounting evidence linking PFAS to cancer and a long list of other negative health effects including: liver damage, decreased fertility, increased risk of asthma, increased risk of thyroid disease, and growth, learning, and behavior impairment.

There are dozens of sites known to be contaminated with PFAS in Wisconsin, including the Town of Peshtigo. It's the third most contaminated site in the United States! But, the truth is, we still don't know how widespread the exposure to these dangerous chemicals might be. There are no federal standards regulating PFAS and until the DNR Board begins this process, there won't be any state standards either.

Wisconsin Manufacturers and Commerce (WMC) and the American Chemistry Council (ACC) have been aggressively fighting any and all efforts to set health standards for pollution. They have even fought efforts to find out what people are being exposed to. Please use my voice to counteract their pro-polluter message.

I am submitting these written comments to demand that the state move forward with protecting our health – not the actions and desires of the polluters.

I therefore ask that the DNR Board approve the beginning of a rule-making process to set standards for PFAS and PFOS chemicals in our drinking water, and groundwater.

Thank you.

Terrence Gerlach
122 Shadow Lake Drive
Waupaca, WI 54981

.....

Gitter, Mike <Mike.Gitter@cityofracine.org>

Dear Mr. DeWeese,

Please see attached support letter for the MEG position comments regarding this rule proposal.

Thank you for your consideration.

mike

Michael Gitter, P.E., CHMM
Interim General Manager
Racine Water & Wastewater Utilities
800 Center St, Room 227
Racine, WI 53403
(262)-636-9430
(262)-497-4015 Cell

**Racine Water and
Wastewater Utilities**

Keith E. Haas, P.E.
General Manager



Michael L. Gitter, P.E.
Chief of Operations
Kenneth M. Scolaro, C.P.A.
Administrative Manager
Chad W. Regalia, P.E.
Chief Engineer

June 7, 2021

Wisconsin Department of Natural Resources
Attn: Adam DeWeese – DG/5
101 S. Webster Street
Madison, WI 53703
Adam.DeWeese@wisconsin.gov

RE: Comments on Statement of Scope for DG-31-20
Revisions to ch. NR 809 related to the promulgation of new drinking water MCLs
For 12 additional PFAS and combined standards for 4 PFAS

Dear Mr. DeWeese:

I am submitting these comments on behalf of the Racine Water Utility (RWU); member of Municipal Environmental Group-Water Division (MEG). Attached is June 3, 2021 correspondence from Lawrie Kobza regarding MEG comments on the proposed Statement of Scope for DG-31-20 related to the promulgation of new drinking water MCLs for 12 additional PFAS compounds and combined standards for 4 PFAS compounds. The RWU supports the MEG position as outlined.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Michael Gitter".

Michael Gitter, P.E.
Interim General Manager
Racine Water & Wastewater Utilities

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health. Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Kimberly Schoenhaar
4457 Hillcrest Dr
Madison, WI 53795
kinschoenhaar@gmail.com
(608) 469-7969

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....

Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health. Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Carissa Sirois
5723 Slate Dr Apt 213
Madison, WI 53718
siroiscl@gmail.com
(860) 338-1762

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Lauren Meyer
10312 63rd St
Kenosha, WI 53142
laumeyer544@gmail.com
(262) 308-7624

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Matthew DeMars
5801 Crabapple Lane
Madison, WI 53711
m.demars@charter.net
(608) 229-2818

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Lynn Shoemaker

172 N Esterly Ave
Whitewater, WI 53190
shoemakl@uww.edu
(262) 473-5347

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health. Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Theresa Lehman
1173 Ava Ct
Neenah, WI 54956
theresa.lehman@miron-construction.com
(920) 969-7314

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Marjie Fendt
309 N Mason St
Appleton, WI 54914
marjiefendt@gmail.com
(920) 830-3493

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Sandra Kettering <sandrakettering@gmail.com>
Please, for the health of people and animals :
Set a standard for toxic PFA's.
Thank you so much!
Sandra

Sandra Kettering Design
An Interior Design Studio

Cell: 715-381-6900

www.houzz.com/pro/sandrakettering

.....
Aleks Kosowicz <guerillawordfare@yahoo.com>
Dear Department of Natural Resources Board Members,

It has come to my attention that you've voted to begin the public process for setting state standards for toxic PFAS chemicals in our ground water and drinking water. I am writing in wholehearted support of this process.

There is no question that the quality of our health is inextricable from the quality of our natural resources, and there are dozens of sites in Wisconsin known to be contaminated with PFAS. How many more are there of which we are still unaware? To say that this is frightening would be the gentlest of euphemisms considering the evidence connecting these chemicals to very serious health crises from cancer and liver failure to thyroid disease and cognitive dysfunction.

Thus far, there are no federal standards regulating PFAS, and, until the DNR Board begins the process, neither are there state standards. Yours is the first chance to set science based standards that protect our public health from these dangerous chemicals, and I am truly grateful for your part in setting it in motion.

Please protect our health by approving a rule-making process to set standards for PFAS and PFOS chemicals in our drinking and ground waters.

Thank you for all you can do to make our state, and our world, a safer, healthier place for all beings to live!

Sincerely,

(Miss) Aleks Kosowicz
Abrams, WI 54101

Sent from Yahoo Mail for iPad

.....
Randi Hoffmann <randi.hoffmann@yahoo.com>

I am an almost 63-year-old woman, mother, grandmother, great-grandmother. I am also a very concerned citizen. I worry about the unregulated toxic chemicals being used so freely, with no concern for health and environmental damages.

Please follow the research of independent scientists, not the liars the chemical companies will send to you. Set strong guidelines to protect Our Home the Earth and ALL Her inhabitants.

WE must protect Our Home the Earth so our children, grandchildren and great-grandchildren can enjoy the beauty of nature. Thank you.

Ms. Randi Hoffmann
95 Rubina Lane Apt 12
Fond du Lac WI 54935
randi.hoffmann@yahoo.com

.....
Carly Michiels <cmichiels@cleanwisconsin.org>

Please accept my written comments for Cycle 11 groundwater standards on NR 140 and NR 809.

Thanks,

Carly Michiels
Government Relations Director
Clean Wisconsin
Pronouns: she/her(s)

634 W Main St. Madison, WI 53703

cmichiels@cleanwisconsin.org

608-251-7020 ex.30



Preliminary Public Hearing and Comment Period
Statement of Scope SS 029-21 relating to NR 140
Statement of Scope SS 030-21 relating to NR 809
Clean Wisconsin Testimony

June 4, 2021

My name is Carly Michiels, and I am Clean Wisconsin's Government Relations Director. Clean Wisconsin is a non-profit environmental advocacy organization working on clean water, clean air, and clean energy issues. We were founded over fifty years ago and have over 20,000 members and supporters around the state. We employ scientists, policy experts, and attorneys to protect and improve Wisconsin's air and water resources.

Clean Wisconsin strongly supports the Wisconsin Department of Natural Resources in moving forward with the proposed rulemaking process relating to the all the Cycle 11 proposed groundwater standards and proposed drinking water standards for PFAS compounds.

Clean Wisconsin respects the objective, science-based process in Wisconsin's groundwater law, Chp. 160 that has regulated harmful pollutants in our groundwater for over 35 years. We support the establishment of new state groundwater quality standards for substances in Wisconsin's waterways that are harmful to public health. The recommendations from the Department of Health Services (DHS) took an extensive amount of time and research to develop. We believe the recommendations through this process meet all statutory requirements, are supported with ample technical information, and reflect the primary responsibility of DHS to protect public health.

Rule No DG-25-20, Statement of Scope SS 029-21 is relating to NR 140 setting standards for polluting substances in groundwater. DHS employed a rigorous, science-based process to develop recommendations for the 11th Cycle of Groundwater Standards, which included standards for six pesticides, individual standards for twelve PFAS, and combined standards for four PFAS. With two thirds of people living in Wisconsin getting their drinking water from groundwater – protecting our groundwater means protecting public health.

Rule No DG-31-20, Statement of Scope SS 030-21 is relating to NR 809 on promulgating drinking water maximum contaminant levels (MCLs) for the recommended 11th Cycle of Groundwater Standards for twelve additional PFAS and combined standards for four PFAS. Setting MCLs is important for the protection of public health and welfare, and for the safety of Wisconsin's drinking water. This rule will be an important step forward in setting standards, reducing exposure, and protecting vulnerable communities from harmful PFAS substances.



PFAS are human-made contaminants, known as harmful “forever chemicals” that build up in the body and environment over time and are already contaminating Wisconsin's water resources. There are over 60 PFAS-contaminated sites across Wisconsin. These substances have serious known public health impacts and an increasing number of toxicological and epidemiological studies have identified a wide range of adverse health effects including decreased fertility, thyroid issues, suppressed vaccine response, and associations with kidney and testicular cancer. Additionally, PFAS pollution disproportionately affects low-income communities and communities of color, decreases home values, harms recreational fishing and wildlife health, and may have significant impacts on the dairy industry.

We need meaningful policies in Wisconsin that provide statewide protections for our communities from these harmful chemicals that are unregulated at the federal level. The standards in both scope statements will serve as key preventative measures from PFAS and pesticides to ensure access to clean, safe drinking water for Wisconsinites.

Clean Wisconsin also supports establishing health-based standards for the six Cycle 11 pesticides. The Department of Agriculture, Trade and Consumer Protection (DATCP) monitoring has noted “significant concern” over finding multiple pesticides in private drinking water wells (*including up to eleven different pesticide compounds in a single well*). Similarly, a recent national survey of pesticides in groundwater supplying public drinking water detected pesticides in 18 of 22 (82%) sampling locations in Wisconsin, finding on average nearly four different pesticide compounds per sample. DATCP’s sampling shows these six Cycle 11 pesticides are contributing to the problem, with some being found at rates exceeding 10% of wells sampled.

In addition to harming human health, some of these pesticides are insecticides – designed to kill insects – and have a profound impact on bees and other pollinators. Groundwater is often used for irrigation and when it contains high levels of pesticides it can unintentionally harm insects. Irrigation water does not have to be applied with the same caution as pesticides and drift or runoff containing these harmful pesticides can impact non-target insects. In places where these pesticides are no longer used, there has not been a significant loss in crop yield or productivity as some in the chemical industry may claim. However, many Wisconsinites care about healthy habitats and ecosystems which can be better protected through setting standards for these pesticides.

Establishing these standards is an important step towards protecting our residents’ health and our environment. Because of the costly and varied impacts to our water and public health, it is particularly important that rules and standards be guided by science and prioritize preventive measures. We look forward to working with DNR and other agencies and stakeholders to develop rules and standards to protect our water from harmful PFAS and pesticides. This will be a lengthy process, and it is imperative that we begin immediately.

.....
Tehmina Islam <tehmينا.islam@gmail.com>

Dear DNR Admin,

My name is Tehmina Islam and I live in one of the neighborhoods that accessed water from Well number 15 which has already been shut down from PFAS contamination.

My home serves as a midwifery practice for hundreds of families who I have had the privilege of caring for as their midwife. Hundreds of pregnant people, including many of my neighbors, have come to my home office for prenatal care. They have also suffered from this water contamination.

The groundwater samples taken at Dane County Truax already exceed the EPA's health advisory limits of 70 parts per trillion. The Environmental Working Group (EWG) is a non-profit, non-partisan organization that provides unbiased public health information about the environment. EWG shows even low levels of exposure to this chemical have been linked to cancer, thyroid disease, and weakened childhood immunity. As you well know, Well number 15, has already been shut down due to levels of PFAS in the well water, measured at 56 parts per trillion (PPT). The non-partisan Environmental Working Group suggests 1 part per trillion (PPT) as a safe level.

Breastmilk is at the top of the food chain. This natural fluid and food can be contaminated with PFAS, therefore affecting the growth of newborns, learning and behavior of infants, and the endocrine and immune systems of children. There could be devastating impacts on our health if you don't act and protect our water.

I became an activist at age 12 and was inspired by the Universal Declaration of Human Rights. Article 25 states that mothers and children are entitled to special care and assistance. The article also states that everyone has the right to a standard of living supportive of their health and well-being. These rights specifically include access to food, clothing, housing, and water. It is imperative that we stand together as a community to safeguard these basic rights for our children and for all our community members.

Please use your voice and power to create and enforce safe drinking water standards in our community. If you drink water and you want safe drinking water, this is your issue.

Sincerely,
Tehmina Islam
Llensed Midwife

--
Tehmina Islam, CPM, LM (she/her/hers)
Access Midwifery, LLC
Providing homebirth midwifery care for our community
www.accessmidwiferywi.org

Do not be daunted by the enormity of the world's grief. Do justly now, love mercy now, walk humbly now. You are not obligated to complete the work, but neither are you free to abandon it. ~ The Talmud

.....
James Janus <jamesmjanus@gmail.com>
There must be more regulation more research into ' forever chemicals' if for no other reason than they are that, forever.

.....
Paul Dearlove <paul@cleanlakesalliance.org>
To Whom It May Concern:

As Deputy Director of Clean Lakes Alliance, I am forwarding and asking that you accept the attached statement regarding PFAS contamination in and around our Greater Madison-area lakes. This statement was officially adopted by our Executive Board at the recommendation of Clean Lakes Alliance's Community Board, an advisory body representing nearly 50 government, business and nonprofit leaders from the Dane County area.

We ask that you please include this statement as part of the public record in support of setting regulatory standards and taking other necessary action around this important public-health issue. Our staff was unfortunately not able to attend

last week's public hearing to deliver testimony in person. However, I invite you to reach out to me if you have questions or would like additional information regarding our position on this topic.

Sincerely,

Paul D. Dearlove
Deputy Director, Clean Lakes Alliance



Paul Dearlove
Deputy Director

(O)608-255-1000 | (C)608-228-0428 | cleanlakesalliance.org |
150 E. Gilman St, Suite 2600, Madison, WI 53703

[DONATE](#) to become a friend of Clean Lakes today!

Clean Lakes Alliance Position Statement on PFAS

Approved by Community Board: 3/10/2020

Clean Lakes Alliance wants our lakes to be viewed and treated as the true center of our community. The more people who share in that vision, the more we can prioritize clean, safe, healthy, and accessible lakes for all who want to use, enjoy, and benefit from them.

Clean Lakes Alliance supports actions that promote the above vision and priorities while opposing actions (or inaction) that runs counter to them. While our primary focus continues to be on reducing phosphorus pollution—the number one driver of toxic cyanobacteria blooms—we will work to draw attention to other lake challenges and opportunities as they present themselves.

What are PFAS?

PFAS (Per- and Polyfluoroalkyl Substances, sometimes known as perfluorinated compounds, including PFOA/PFOS) are a category of approximately 5,000 human-made chemicals. They are found in a wide range of industrial and consumer products, including food packaging, non-stick products, fabric/carpet coatings, personal care products, and firefighting foams. PFAS are highly persistent, meaning they do not biodegrade. The widespread use of these chemicals has resulted in the contamination of groundwater, surface water, and soils in many parts of the United States, as well the bioaccumulation of PFAS in humans.

Why are PFAS a growing concern for the Yahara River Watershed?

While the science is still developing, current evidence demonstrates that exposure to certain PFAS may cause serious health conditions, including certain forms of cancer, impaired fertility and fetal development, high cholesterol, and pregnancy complications. In Madison, nearly half of the municipal wells were shown to have detectable levels of PFAS, and one well was closed due to PFAS contamination. In addition, high PFAS levels were found in Starkweather Creek, which discharges into Lake Monona. This contamination could be linked to high levels of PFAS being found in shallow groundwater in the area. Public Health Madison & Dane County subsequently issued warnings urging residents to limit the amount of fish consumed from Lake Monona and avoid swallowing water.

What is Clean Lakes Alliance's position on PFAS?

Clean Lakes Alliance is committed to the overall health of the Yahara River Watershed and the ability of all residents to enjoy clean lakes. PFAS are a direct threat to our community's ability to use and enjoy the lakes, and PFAS contamination disproportionately harms marginalized populations. Populations disproportionately affected include those who rely on Lake Monona fish as a regular food source, and the neighborhoods around Starkweather Creek that are home to higher numbers of people of color and lower-income families.

Therefore, Clean Lakes Alliance urges our local, state, and federal governments to take action to: 1) prevent further PFAS contamination; 2) set and update limits for PFAS that protect public health; 3) test to determine the sources and extent of contamination; and 4) clean up existing sources of PFAS contamination.

Sources:

FDA Statement on PFAS June 11, 2019 Earth Justice

Factsheet on PFAS Jan. 2019

The Capital Times, "Unknown fear: Madison residents are increasingly alarmed by PFAS levels in local waterways," Steven Elbow, Dec 11, 2019

.....
Curt Czarnecki <cczarnecki@kenosha.org>

Attached please find the public comments submitted on behalf of the Kenosha Water Utility in reference to DG-31-20.

Please let me know if you have any questions or concerns.

Sincerely,

Curt Czarnecki, P.E.
General Manager
Kenosha Water Utility
4401 Green Bay Road - Kenosha, WI 53144
Phone: (262)653-4306
Fax: (262)653-4303
www.kenosha.org
cczarnecki@kenosha.org

Board of Water Commissioners

David Bogdala, Chairman
Bruce Fox, Vice-Chairman
Mitchell Pedersen
Jack Rose
Dominic Ruffalo
Bill Siel



Curtis Czarnecki
General Manager
4401 Green Bay Road
Kenosha, WI 53144
Phone (262) 653-4300
Fax (262) 653-4303

"Providing and Protecting Kenosha's Greatest Natural Resource"

Date: June 4, 2021

To: Department of Natural Resources
Attn: Adam DeWeese – DG/5
P.O. Box 7921
101 S. Webster Street
Madison, WI 53707-7921

From: Curtis Czarnecki, General Manager

Subject: Comments on Statement of Scope for DG-31-20
Revisions to Ch. NR 809 related to the promulgation of new drinking water MCLs for 12 additional PFAS and combined standards for 4 PFAS

Mr. DeWeese,

The Kenosha Water Utility (KWU) supports the comments filed on behalf of the Municipal Environmental Group – Water Division dated June 3, 2021 as it relates to the Statement of Scope for Rulemaking No. DG-31-20.

The practice and precedent of waiting to revise NR 809 until after the Environmental Protection Agency establishes federal drinking water standards for PFAS using the Safe Drinking Water Act (SDWA) standard setting process is what KWU would advocate for. The SDWA standard setting process not only considers the health risks but also requires a cost benefit analysis to be completed to ensure the health benefits achieved by establishing a new standard justify the costs of meeting that standard and that comparable health benefits could not be achieved with a higher standard that carries with it a lower cost.

KWU takes our responsibility of providing clean and safe drinking water to our customers in a fiscally responsible manner extremely seriously. The SDWA standard setting process provides guidelines for establishing drinking water standards and has proven successful since its implementation.

Thank you for taking the time to consider these comments on behalf of KWU. If you have any questions or concerns do not hesitate to contact me.

Sincerely,

Curtis Czarnecki, P.E.



.....
Joe Weitekamp <weitekaj@gmail.com>

This email is to document the strong support by both myself and my wife for setting standards for groundwater and drinking water in the state of Wisconsin. For years we found out that we have been consuming PFAS and PFOS compounds in our water. This is as a result of fuel spills at the LSE airport which were covered in AFFF foam. There was also an equipment fire that was extinguished using AFFF foam.

At this point, the City of LaCrosse hasn't been named as the responsible party for our contamination. Neither the DNR, nor the City have paid for any of the testing in our neighborhood. We are awaiting test results that will indicate if VOC's are also present in our water as a result of 125 gallons of fuel soaking into the soil less than 1/2 mile upstream in the aquifer from where we live.

Please advocate for this legislation.

Regards,

Joseph A. Weitekamp
Kathryn J. Weitekamp
2603 Thomas St, La Crosse, Wi 54603

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health. Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Keith Johnson
340 N Minnesota St Apt 108
Muscodia, WI 53573
earthsayge@yahoo.com
(608) 537-2497

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Jean Kowalski
3025 N 70th St
Milwaukee, WI 53210
jkowalsk@milwpc.com
(414) 774-1162

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

LISA HELSTEIN
10720 Stadt Rd.
Marshfield, WI 54449
helsteinkh@aol.com
(715) 591-2072

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health. Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

Randolph Schoedler
3709 W Michigan St
Milwaukee, WI 53208
randyss12@gmail.com
(414) 448-1470

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
Claire Gervais <cmgerva@gmail.com>

Hello DNR
Attached are my comments about setting stricter standards for PFAS chemicals in drinking water. Thank you for your work on this!
Claire Gervais, MD

PFAS Comments
Groundwater Standards in Wisconsin

Claire Gervais, MD
cmgerva@gmail.com
608-220-8819

PFAS are extremely persistent chemicals and difficult to keep out of our groundwater while posing serious health risks including cancer, thyroid disease, high cholesterol, ulcerative colitis, and pregnancy-induced hypertension. They are found in breast milk and cord blood, and since PFAS are known to be developmental toxins, this is a threat to our next generation and perhaps generations to come.

As a family medicine physician, I am worried for my patients, which includes pregnant women, infants and children. I'm particularly worried about those communities with contaminated wells like wells 15 and 16 in Madison. As we are well aware, the Truax Air National Guard Base field is a major source of PFAS groundwater contamination due to firefighting foam, in addition to other PFAS sources including landfills.

Most exposure occurs through contaminated food or water, so it is extremely important that we keep PFAS out of our water and set high standards for drinking water. Additionally, very few public drinking water systems have been tested for PFAS and there are no state or federal requirements to test.

Due to water contamination in Peshtigo, Wisconsin, potable wells were tested for 36 PFAS compounds last fall, but we have yet to estimate the size of possibly the largest plume in Wisconsin. Once the collected data is analyzed and a final report comes out, we will know more, but now is the time to work on stricter standards for groundwater contamination by PFAS chemicals. (1) Unfortunately, PFAS chemicals move quickly due to high solubility and can develop into huge plumes such as in Woodbury, Minnesota, where the plume is 10+ miles long and covers 100 mi².

The EPA set an outdated and unenforceable standard of 70 ppt in 2016 but based on review of current health data, stricter standards have been adopted by our neighboring states of Michigan and Minnesota. Michigan set new strict standards almost a year ago for 7 PFAS chemicals. For example, previously MCLs were 70 ppt for PFOA and PFOS. The new the standard is at 8 ppt for PFOA and 16 ppt for PFOS. (2) Similarly, Minnesota has also set higher standards than the EPA for 7 PFAS chemicals. (3)

Currently there are no environmental standards for groundwater maximum contaminant levels in Wisconsin so it is pertinent that the DNR establish these standards as the Department of Health Services (DHS) recommends. I would like the DNR to endorse DHS's recommended enforcement standards for PFAS chemicals for 12 individual PFAS and combined standards for 4 PFAS.

DNR secretary Preston Cole stated "Clean drinking water is a public health priority," to which we can all agree. Unfortunately, we cannot completely eliminate PFAS chemicals from our environment. Therefore, it is crucial to both set strict standards for PFAS chemicals in our drinking water and eliminate PFAS contamination sources. If we can achieve these goals at a high level, then we are on the path to improved safety of our drinking water.

REFERENCES

1. <https://dnr.wisconsin.gov/topic/PFAS/PotableWells.html>
2. https://www.michigan.gov/egle/0,9429,7-135-3308_3323-534660--,00.html
3. <https://www.health.state.mn.us/communities/environment/hazardous/topics/pfcs.html#safelevels>

.....
Cassie Hanan <cassiejhanan@gmail.com>

I am writing today to provide my support for expanded PFAS regulation in the State of Wisconsin. I have watched over the last 8 months as my community members, through no fault of their own, have been dealing with the loss of clean, safe drinking water. Many of our residents do not have a full understanding of what PFAS are, the health implications, or what the proposed standards mean. We have an obligation to the residents of the state to ensure that everyone has clean water.

Our community of approximately 4,300 residents has been dealt with a large burden. Elected officials (who make a salary of a mere \$250 a month) have spent countless hours trying to educate themselves on PFAS. They have worked tirelessly to investigate long-term solutions.

However, without much regulatory authority at the state level, this has proven to be a very difficult task. I encourage the state to codify PFAS standards in order ensure that the DNR can move more quickly and with more authority to assist other communities with the same contamination issues. Furthermore, I encourage administrative rules that require EVERY municipal water system in the state of Wisconsin to be tested for PFAS.

Many states have been more proactive than Wisconsin when dealing with these emerging contaminants. Clean water is the lifeblood of everything in the state from outdoor recreation to fishing, etc. Over time, more communities will be found with PFAS contamination. Now is the time to ensure that standards are set into place. The DNR should not be hesitant to act because their regulatory authority is a 'gray area'.

Lastly, I write to you as a mother. I have three children that have been drinking contaminated water for at least 9 years. I worry about the possible health effects from them drinking the water. I drank the same water when I was pregnant and breastfed them. We now know that PFAS is not only present in breastmilk, it is concentrated.

Thank you for your consideration.

Cassandra Hanan
Clerk/Treasurer
Town of Campbell

.....
John Evenson <jevenson@sbcglobal.net>

Hello:

PFAS chemicals are a ticking timebomb. It is most urgent to study these chemicals in depth and to set standards for drinking water to begin to protect the public. I regularly fish the Madison chain of lakes, and eat what I catch, as do hundreds of Madisonians. Have we already ingested dangerous amounts of PFAS? I urge the DNR to make this one of your top priorities.

.....
Jose Flores <josefloresau@gmail.com>

Dear DNR,

Please take the brave and proactive action to help prevent exposure to PFAS & PFOS Chemicals. Even setting initial standards on these chemicals will be applauded as a laudable achievement towards protecting the health of all our Wisconsin citizens and communities. The science is clear that PFAS and PFOS are plastics that take a long time to break down and pose significant health risks, especially to communities in impoverished settings.

Thank you for taking the time to read this message.

.....
Kayla Furton <kverschay@gmail.com>

My name is Kayla Furton and I am a resident in the Town of Peshtigo in the middle of a massive plume of PFAS contamination. I am writing today in support of setting standards for PFAS for drinking and ground water. For decades, PFAS compounds have been used unchecked -- the consequences for health, the environment, communities, and the economy are serious. in many instances -- such as my own -- a corporation made billions in profits while polluting with these dangerous compounds that truly cannot be cleaned up.

I grew up in the Town of Peshtigo on the shores of Green Bay and five years ago, my husband and I decided to move our family -- with three young children -- back here, where our waterfront, woods, and now our well is contaminated. The water coming into our home tests at 60ppt of combined PFAS compounds.

Sadly, my family is not unique in our contaminated property and well and at least we know so we can take steps to protect ourselves and our family. Many other individuals and families do not have that choice as so many water sources (municipalities and wells) are not tested for PFAS. Over the past few years, as a resident, a member of S.O,H2O, and now Town of Peshtigo supervisor, I see the impact of citizen advocates, DNR actions, and the governor's progress in regards to clean water, but the fact remains that we, and all of Wisconsin, need set standards for PFAS drinking and ground water. Not having any regulation extremely limits options for residents, homeowners, and all Wisconsinites. Clean water is a most essential need -- these standards take a huge step towards ensuring that.

.....
Andi Rich <andreakay25@gmail.com>

Please stop delaying, we have known these chemicals are highly toxic to humans for over 20 years, and we NEED regulations to save lives.

Please set the strictest standards possible based on the science available.

Thank you,

Andi Rich
845 Hockridge
906-290-6856

.....
Craig Summerfield <csummerfield@wmc.org>

Adam,

Attached are comments from Wisconsin Manufacturers & Commerce, Wisconsin Paper Council, Wisconsin Civil Justice Council, Wisconsin Water Alliance, Wisconsin Dairy Alliance, and American Chemistry Council. The comments are regarding to SS 029-21 and SS 030-21, pertaining to proposed rulemaking for new drinking water and groundwater standards for PFAS.

Thank you for your consideration. Please confirm receipt of these comments.

Sincerely,

Craig Summerfield
Director of Environmental & Energy
Policy



csummerfield@wmc.org
Work: 608.258.3400
Direct: 608.661.6910

501 E. Washington Ave.
Madison, WI 53703
www.wmc.org





TO: Wisconsin Department of Natural Resources

FROM: Wisconsin Manufacturers & Commerce
Wisconsin Paper Council
Wisconsin Civil Justice Council
Wisconsin Water Alliance
Wisconsin Dairy Alliance
American Chemistry Council

DATE: June 10, 2021

RE: Comments on Statement of Scope SS 029-21 (Board Order DG-25-20) and
Statement of Scope SS 030-21 (Board Order DG-31-20)

The above referenced organizations appreciate the opportunity to provide written comments regarding Statements of Scope SS 029-21 and SS 030-21. These scope statements pertain to proposed rulemaking for new drinking water and groundwater standards for PFAS.

Legal Concerns

Our organizations have a number of concerns with the legality of the scope statements for both rules. These concerns include, but are not limited to, the following:

- Scope statements are unlawfully vague: Chapter 227 rulemaking requires agencies to provide “a description of...new policies proposed to be included in the rule.” [See s. 227.135(1)(b)]. However, both scope statements fail to include a clear description of these new policies.
 - For example, on the first page of SS 029-21 the document notes that “additional rule changes may be considered to accomplish the objectives described in this scope statement. These changes may include correction of errors and omissions, clarification of definitions and terms, and consideration of cumulative health risk assessment.” Such statements seem to suggest that the Department will pursue any policy changes it deems fit, and even suggests that the DNR may consider

rule changes beyond NR 140 of the administrative code. This is not permitted under Chapter 227 rulemaking requirements, and the Department needs to clarify these scope statements to explicitly identify *all* of the proposed new policies.

- Recommended standards are not peer-reviewed: Both scope statements point to DHS Cycle 11 Standards as the primary basis for this rulemaking. However, these unique,

Wisconsin-only recommendations are not subject to any type of scientific, peer review. Past practice by the DNR suggests that the agency simply intends to incorporate these standards “as is” into the administrative code without allowing either the scientific community *or* the regulated community the opportunity to weigh-in in any meaningful manner. Given the significant, unknown costs of these recommended standards, this practice is deeply troubling.

- Combined standards are not lawful: In addition to promulgating individual standards for 12 PFAS substances, both scope statements also indicate the DNR’s intent to incorporate *combined* standards for 4 PFAS substances. However, the Department lacks the statutory authority to incorporate combined standards into the administrative code.

Concerns with Recommended Standards

In addition to the concerns regarding the scope statement’s legality, our coalition has serious concerns with the recommended standards themselves. With many of the Cycle 11 recommendations from the Department of Health Services, the health information is simply insufficient to make a recommendation. These shortcomings with the DHS Cycle 11 analysis help illustrate the need for peer review of these recommendations and an opportunity for the scientific community, the regulated business community, and the public as a whole to participate and provide comment.

To help address these issues, our organizations request that the scope statements be modified to clarify that the DNR will consider changes to the numeric standards recommended by DHS in their Cycle 11 recommendations on November 6, 2020.

Concerns with Economic Impact Estimate

Our organizations would also like to better understand how the DNR determined the anticipated economic impact included in both statements. Specifically, SS 030-21 (NR 809 – Drinking Water) acknowledges an economic impact “greater than \$10 million in any two-year period.” However, SS 029-21 (NR 140 – Groundwater) estimates a “moderate” economic impact of “up to \$5 million/year.”

Our coalition requests that the DNR share the data it is relying on to provide these preliminary estimates. This is important because, as the Department is aware, if compliance costs for a rule exceed \$10 million over any two year period, it triggers the requirements of *2017 WI Act 57* and

the agency cannot promulgate the rule without either modifications to lower the cost or authorization via new legislation.

Conclusion

In summary, our organizations are seeking the following modifications to both scope statements:

1. Clarification of the policies to be addressed in the scope statement, as required by s. 227.135(1)(b).
2. Acknowledgement that the Cycle 11 recommendations are not peer-reviewed.
3. Removal of combined standards, as this authority is not explicitly granted by statute and is thus unlawful.
4. Stipulation that the DNR will consider modifications to the November 6, 2020 recommended standards when presented with economic and scientific data from the regulated community and the public.

We are also requesting the data utilized by the Department to provide the economic impact estimates included in both scope statements.

Although all of our requests are important, our coalition is especially concerned about being able to collaborate in earnest with the DNR on these proposed rules. Thus, the last modification above is especially critical. In addition, **our coalition asks the DNR the following: Will the DNR consider substantive changes to the DHS recommended numerical PFAS standards if presented with sound scientific and/or economic data?** This question is critical because the DHS Cycle 11 recommended standards were unilaterally determined by that agency and not subject to *any* scientific, peer review nor *any* public review.

Thank you for considering the comments of our organizations.

.....
Marjorie Irving <mirving@staffordlaw.com>
RE: Statement of Scope SS 029-21 (Board Order DG-25-20)

Dear Mr. Rheineck:

Attorney Wishart has asked that I forward the attached comments to you. If you have any questions, please feel free to contact her. Thank you.

Marjorie Irving
Legal Assistant

**STAFFORD
ROSENBAUM**

Celebrating
140
Years
of
Excellence

Marjorie Irving | Legal Assistant
mirving@staffordlaw.com | 608.259.2637 | Fax. 608.259.2600 |
222 West Washington Avenue, Suite 900
P.O. Box 1784 | Madison, Wisconsin 53701-1784
www.staffordlaw.com | [Stafford Blogs](#) | [LinkedIn](#)

Wisconsin member firm of [ALFA International](#),
the premiere global network of independent law firms.

Vanessa D. Wishart
222 West Washington Avenue, Suite 900
P.O. Box 1784
Madison, WI 53701-1784
VWishart@staffordlaw.com
608.210.6307



June 10, 2021

Department of Natural Resources Attn: Bruce Rheineck – DG/5 101 S. Webster Street
Madison, WI 53703 BruceD.Rheineck@wisconsin.gov

VIA EMAIL
DNRAAdministrativeRulesComments@wisconsin.gov

RE: Comments of the Municipal Environmental Group – Wastewater Division
Statement of Scope SS 029-21 (Board Order DG-25-20)

Dear Mr. Rheineck:

We are submitting these comments on behalf of the Municipal Environmental Group–Wastewater Division (MEG Wastewater). MEG Wastewater is an organization of over 100 municipalities statewide who own and operate wastewater treatment plants. We represent facilities ranging in size from small sanitary districts to larger utilities. MEG appreciates the opportunity to comment on the Statement of Scope (SS 029-21) on the revisions to ch. NR 140 that include setting numeric criteria for substances including 16 per- and polyfluoroalkyl substances (PFAS).

While MEG supports the regulation of PFAS compounds based on due deliberation and credible science, we have a number of concerns with the Statement of Scope.

First, MEG encourages the Department to follow the lead of the federal government in establishment of numeric criteria for PFAS. Federal efforts to regulate PFAS compounds are underway, and the regulated community would greatly benefit from a standardized approach to PFAS regulation.

Second, the Statement of Scope includes the establishment of individual numerical standards for 12 PFAS compounds and combined standards for 4 PFAS compounds. Scientifically supportable information on the toxicological concerns regarding all PFAS compounds, but particularly those other than PFOA and PFOS, is still under development. MEG urges the Department to ensure that it has available scientifically valid and supportable information and risk analyses before establishing criteria for these compounds.

Third, the Statement of Scope states that the impact of development of PFAS criteria is “moderate (up to \$5 million/year)” and that economic impacts are likely to be moderated by the fact that the Department anticipates that “there will be few cases where the proposed standards will be exceeded where existing standards are not already being exceeded.” However, MEG anticipates that there could

Madison Office

222 West Washington Avenue
P.O. Box 1784
Madison, Wisconsin
53701-1784

608.256.0226
888.655.4752
Fax 608.259.2600
www.staffordlaw.com

Milwaukee Office

1200 North Mayfair Road
Suite 430
Milwaukee, Wisconsin
53226-3282

414.982.2850
888.655.4752
Fax 414.982.2889
www.staffordlaw.com

June 10, 2021

Page 2

be many impacts of this rule beyond existing RP sites, potentially including projects that require pit trench dewatering and land application of materials. Further, even for existing RP sites, the costs associated with the establishment of PFAS criteria could be significant due to the extremely limited options for disposal of PFAS compounds. MEG therefore anticipates that there may be significant economic impacts due to required remediation for PFAS contamination, both for new projects or sites and those sites that already require remediation due to the exceedance of another NR 140 standard.

Thank you for consideration of these comments. MEG greatly appreciates the opportunity to participate in this process and welcomes further communication with the Department.

Sincerely,

STAFFORD ROSENBAUM LLP



Vanessa D. Wishart

Paul G. Kent

VDW:mai

.....
Toni Herkert <therkert@lwm-info.org>

Please accept these comments on behalf of the League of Wisconsin Municipalities.

Thank you,

Toni

Toni Herkert
Government Affairs Director
League of Wisconsin Municipalities
office: (608) 267-3294
cell: (608) 444-5781
www.lwm-info.org



131 W. Wilson St., Suite 505
Madison, Wisconsin 53703
phone (608) 267-2380; (800) 991-5502
fax: (608) 267-0645
league@lwm-info.org; www.lwm-info.org

June 10, 2021

Department of Natural
Resources Attn: Bruce
Rheineck – DG/5
101 S. Webster Street Madison, WI 53703

Via Email - BruceD.Rheineck@wisconsin.gov and
DNRAAdministrativeRulesComments@wisconsin.gov

Mr. Rheineck:

The League of Wisconsin Municipalities welcomes the opportunity to submit comments related to the Statement of Scope (SS-029-21) on the revision to ch. NR 140 related to numerical standards for 16 new per and polyfluoroalkyl substances (PFAS) including 4 combined standards. The League is a nonprofit and nonpartisan association of 594 cities and villages, nearly all of which operate wastewater treatment plants that would be affected by these proposed rules.

The League supports following sound science, sampling, and monitoring to produce technologically and financially feasible regulations for PFAS compounds. We encourage the department to follow the lead of the federal government with regard to numeric standards for this emerging group of contaminants. After studying the available data regarding wastewater discharges from facilities that manufacture PFAS, EPA published an advance notice of proposed rulemaking (ANPRM) on March 17, 2021, to solicit data and information regarding manufacturers of PFAS and the presence and treatment of PFAS in discharges from this industrial category. While municipal wastewater facilities are not a manufacturer of PFAS, they will be impacted by numeric effluent standards. EPA is still gathering the scientific information necessary to develop PFAS standards. Wisconsin should avoid getting ahead of the EPA when setting standards.

In addition, because research, sampling and analysis at the federal and state level is ongoing, it would be difficult for DNR to determine with any certainty whether the economic impact of the development of PFAS numeric criteria is moderate and limited to up to \$5 million per year. The League believes that there will be significant costs beyond existing RP sites, including potential land spreading and soil contamination implications, increased remediation and redevelopment costs, and significant disposal costs due to the lack of disposal options currently available. It is premature to indicate that the economic impact would be moderate.

We look forward to continuing the dialogue with the department on this important issue. The League is supportive of regulating these emerging compounds in a scientifically supported and financially feasible manner.

Kind Regards,

Toni R Herkert

Toni Herkert, Government Affairs Director
Wisconsin League of Municipalities

YOUR VOICE. YOUR WISCONSIN.

.....
Toni Herkert <therkert@lwm-info.org>

Adam,

Please accept these comments on behalf of the League of Wisconsin Municipalities.

Thank you,
Toni

Toni Herkert
Government Affairs Director
League of Wisconsin Municipalities
office: (608) 267-3294
cell: (608) 444-5781
www.lwm-info.org



131 W. Wilson St., Suite 505
Madison, Wisconsin 53703
phone (608) 267-2380; (800) 991-5502
fax: (608) 267-0645
league@lwm-info.org; www.lwm-info.org

June 10, 2021

Department of Natural
Resources Attn: Adam
DeWeese– DG/5
101 S. Webster Street Madison, WI 53703

Via Email – Adam.DeWeese@wisconsin.gov and
DNRAAdministrativeRulesComments@wisconsin.gov

Mr. DeWeese:

Please accept the submission of these comments on behalf of the League of Wisconsin Municipalities. The League, a nonprofit and nonpartisan association of 594 cities and villages, welcomes the opportunity to submit comments related to the Statement of Scope (SS-31-20) on the revision to ch. NR 809 related to the promulgation of new drinking water maximum contaminant levels for 12 additional PFAS and combined standards for 4 PFAS compounds. We are submitting these comments on behalf of the municipally owned and operated water systems in the state.

The League supports following sound science, sampling, and monitoring to produce technologically and financially feasible regulations for PFAS compounds. We would like to encourage the department to follow the lead of the federal government with regards to setting maximum contaminant levels for this emerging group of contaminants. On February 22, 2021, EPA reissued final regulatory determinations for contaminants on the fourth Contaminant Candidate List. EPA is making final determinations to regulate two contaminants, PFOA and PFOS, in drinking water. With the final Regulatory Determinations for PFOA and PFOS, EPA will move forward to implement the national primary drinking water regulation development process for these two PFAS contaminants. The EPA also recently proposed the fifth Unregulated Contaminant Monitoring Rule. This action by EPA begins the process for sampling additional PFAS chemical contaminants between 2023 and 2025. This proposed action would provide EPA, states, and communities with scientifically valid data on the occurrence of these contaminants in drinking water. EPA has an established process and Wisconsin should participate in that process.

In addition, the League fully endorses the entirety of the comments submitted by Lawrie Kobza on behalf of the Municipal Environmental Group – Water Division (MEG--Water) on June 3, 2021. We urge you to consider the recommendations submitted by MEG – Water.

Thank you for the opportunity to provide comments on the scope statement for NR 809, we look forward to continuing the dialogue with the department on this important issue. The League is supportive of regulating these emerging compounds in a scientifically supported manner.

Kind Regards,

Toni R Herkert

Toni Herkert, Government
Affairs Director Wisconsin
League of Municipalities

YOUR VOICE. YOUR WISCONSIN.

.....
Dear Department of Natural Resources,

I am writing to you in support of the scope statements for DG-25-20 and DG-31-20. These rules are important to protecting the drinking water of Wisconsinites and I'm glad to see the DNR intends to ground the rules in the best science.

Per- and polyfluoroalkyl substances (PFAS) pose a threat to Wisconsinites. These chemicals, which are found in our air, water, and soil, can have severe effects on our health, and wherever we look for them, we find them.

The number of PFAS chemicals already listed with trademark formulas now number well into the thousands, with new formulations constantly being developed. While Wisconsin needs protections for all PFAS and PFOA chemicals, the rules for the 16 chemicals considered until rules DG-25-20 and DG-31-20 will protect our public health.

Given their persistence, mobility and toxicity, the DNR must create solutions for private well owners and public water sources that protect our waters and protect our health and welfare -- not polluter profits.

In addition to regulating these chemicals as a family, just like PCBs and dioxins, eliminating liability waivers for brownfield cleanups, and requiring companies who have knowingly used these chemicals to pay for cleanup costs, there must be strong PFAS contaminant level regulations set. This means setting safe numerical standards and drinking water contaminant levels for PFAS, in alignment with DHS recommendations.

Though more needs to be done in the future to protect our water, the DNR moves us in the right direction with their proposed scope of updates to NR 140 and NR 809. These standards are crucial to establish if we want to ensure clean, safe ground and drinking water for Wisconsinites, and I look forward to supporting this rulemaking process.

Sincerely,

James Heindl
2053 S 86th St
West Allis, WI 53227
jim@heindfamily.org

(414) 327-5436

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

.....
brent folstad <bucky3.bf@outlook.com>
Sent from Mail for Windows 10

They used to post at Monona bay that it was safe to eat the panfish, unlimited amount..... Now they are poisoned and they are saying one meal a month....We stopped a 45 year tradition off fishing Monona Bay and the surrounding bays, because of the polluted fish in the Madison Lakes. ... This is sad, but the polluted fishing is only getting worse, despite your best efforts I believe your fighting a losing battle.. Madison lakes were such a tremendous fishery for the sportsman just a few short years ago. It was a big part of my livelihood.

I was looking forward to my favorite pastime of fishing and eating crappies from lake Monona and Waubeasa during my upcoming retirement. I will never eat another fish from these lakes, breaks my heart

I cant help but think of Chief Seattle's words: {Contaminate your bed and you will one night suffocate in your own waste.}

I believe we have arrived.
Please keep up fighting the good fight

.....
Teresa Hall <teresachall91@gmail.com>
As an Environmental Toxicologist, I support the changes to NR 809 and NR 140 for establishing groundwater and drinking water standards for PFAS.

Clean drinking water is a human right. It is critical that all populations, not just those that can purchase bottled water or install expensive filters, be guaranteed access to safe drinking water. These forever chemicals may also threaten our drinking water for future generations.

We can not wait for the federal government to act on PFAS. The federal government began hearings on DDT in 1963, but Wisconsin took the early lead and banned DDT in January of 1970, while the federal government didn't ban DDT until December 1972. I urge Wisconsin, to again, take the lead to protect our drinking water by establishing PFAS standards.

Thanks,
Teresa

Dr. Teresa Weglarz

1224 Montclair Ct.
Appleton, WI

.....
Denise Roland <dmroland3@charter.net>
To Whom It May Concern:

We are one of the many families with contaminated well water from the PFAS on French Island. I have been involved with one of the initial advocacy groups started, but still have a lot to learn about PFAS - as it

is a large and widespread problem with a lot of angles. I DO know, that in my research (and I have some legal and more medical background knowledge from previous careers)...there are way too many CANCER diagnoses in the Town of Campbell. Since, I, myself was diagnosed with endometrial cancer last year, with abnormal MELF cells and a mutated gene (with no explanation - per Mayo Rochester top doctor in OB/GYN Oncology)....I would say the "allowable numbers" should be looked at immediately and reduced to almost NO ACCEPTABLE LEVELS!!!! If I find a way, I will be collecting data of all the cancer cases on French Island, compare medical records, and pathology reports.

This is not going away. It is NOT ACCEPTABLE. No matter how many times they "re-work" the formula for PFAS into long chain, short chain, medium chain....whatever they "think" will be better and NOT hurt us, our fish, our other wildlife, or our entire ecosystem....it's a lie. It is NOT natural, normal or acceptable. It is also NOT reversible. It has to be stopped NOW....

And, we hold YOU responsible for keeping our air and water clean and healthy! If there is anything I can do to help with that process, please let me know!

A very concerned resident family of the Town of Campbell,

Neal & Denise Roland
3507 Lakeshore Dr
La Crosse, WI 54603
Home: 608-781-69113
Cell: 608-386-1311

.....
Kristen Edgar <kbigari@hotmail.com>
Public Comment:
Name: Kristen Edgar
County: Marinette
Town of Peshtigo

Address: N2467 Shore Drive Marinette, WI

I am writing today in support of NR 809 and NR140. In the Town of Peshtigo (Marinette County), we see the direct results and consequences of unregulated AFFF testing and usage and dumping of these toxic chemicals. Marinette County's PFAS contamination is the largest and most complex environmental contamination and clean-up site in the history of the state of Wisconsin, as well as one of the three largest PFAS sites in the United States.

This PFAS Contamination crisis in the Town of Peshtigo has impacted many families in our community. The establishment of Groundwater standards for these chemicals is important for the future of Wisconsin. Many families are dealing with the realities of contaminated wells, multiple exposure pathways, adverse health impacts, and many unknowns such as just finding a path to clean water. Many of us will not live long enough to see the mess cleaned up in our community. Everyone deserves clean drinking water in Wisconsin.

While passing these standards will not fix our current contamination situation in the Town of Peshtigo- if passed these standards have the potential to protect other communities from the same massive contamination our community is facing. The definition of insanity is doing the same thing and expecting different results. Wisconsin not establishing standards will only reinforce companies to pollute the water with these toxic chemicals. It has gone on too long and the toxicity of these chemicals is now known. Let us be proactive and not reactive for Wisconsin by establishing standards in order to be protective of people's health, homes, and the local economy.

A positive outcome for our community, and all of Wisconsin, in regards to PFAS, will take collaboration and a concerted effort on all fronts.

Respectfully,
Kristen Edgar

.....
Jessica Clochesy <jessicaclochesy@gmail.com>

My name is Jessica Clochesy, and I am a resident of the Town of Peshtigo in the middle of a massive plume of PFAS contamination. I am writing to express my very strong support for setting standards for PFAS for drinking and ground water. PFAS compounds have been left unchecked for far too long, with significant consequences for health, communities, drinking water, the environment/ecosystem, soil, local crops and livestock, the economy, and the entire Great Lakes water system. In my community, a corporation made billions in profits while polluting, often knowingly, with dangerous compounds that cannot truly be cleaned up. The contamination continues, without effective mitigation or clean up, and the consequences to our community are spreading. The profits are being privatized, while the great risks have been and are socialized - spread out over the entire community.

I spent my childhood on the shores of Green Bay, in the Town of Peshtigo, and moved my family, with three young children, back here two years ago. Our drinking well and woods are now contaminated, and we privately bear the cost and hassle of filtering drinking water that we did not poison or pollute ourselves. As a conscientious consumer and parent, I have vigilantly guarded our family against contaminants in our personal and household products - but I can't guard against a corporation polluting the groundwater beneath our home and consequently our well, or the stream outside of the high school where I teach and where my children play soccer. This is unconscionable.

What's worse is that my situation is not unique, with our contaminated water, in our contaminated property or in our contaminated community. The one positive is that at least we know so that we can take steps to protect ourselves. Too many other individuals and families are not given that information, or that decision since many water sources, in both municipalities and wells, are not tested for PFAS. As a part of community advocacy for clean water, I know we must all work together, but we cannot do it on our own. All of Wisconsin needs set standards for PFAS for drinking and ground water. We cannot trust corporations to do the right thing - locally, there is no plan for the responsible party to remediate the contamination on my property, or provide a clean drinking water option. They are still releasing PFAS compounds into our community, and our community, as well as all others in Wisconsin, needs regulations to protect our health, our children, and our state's environmental and economic resources.

Clean water is an essential need - and should be a protected human right. These standards take a tremendous step towards ensuring that.

Sincerely,
Jessica Clochesy
Town of Peshtigo, WI

.....
Cheryl Nenn <cheryl_nenn@milwaukeekeeper.org>

To Whom It May Concern,
On behalf of Milwaukee Riverkeeper, we support DNR's efforts to move forward with the rule-making process to set state standards for toxic PFAS or "forever chemicals" in our ground water, drinking water, and surface waters. These standards are imperative for protecting our rivers and public health. PFAS contamination is linked to many diseases and health threats including cancer, liver damage, and learning impairments, among others.

PFAS contamination in Wisconsin is widespread, several communities have threatened drinking water systems, and WDNR has found PFAS contamination in nearly every water and fish sample taken from the Milwaukee Estuary Area of Concern. In addition, there is documented and ongoing contamination of the Kinnickinnic River from runoff of firefighting foams and other PFAS chemicals used at Mitchell Airport and adjacent National Guard/Federal facilities. We are gravely concerned about the impact of these chemicals on our waters, fish, wildlife, and communities. There is also a good chance that we spend hundreds of millions as part of the AOC program to clean up our estuary of PCBs, and ultimately will have to repeat that work for PFAS at great cost. There are no federal standards yet, so Wisconsin needs to step up to protect its citizens and the water we depend on to live. We understand that there is significant industry opposition to these rules. But we need you to stand firm against that pressure and enact PFAS standards for groundwater, drinking water, and surface water as soon as possible that protect our public health and not polluters.

Respectfully,

Cheryl Nenn

[Cheryl Nenn](#)

Riverkeeper

[Milwaukee Riverkeeper](#)

main: 414.287.0207 cell: 414.378.3043

[find me at: 600 E. Greenfield Ave. | Milwaukee, WI 53204](#)

.....

Bill and Cindy Verschay <verschay@gmail.com>

Our names are Bill and Cindy Verschay, residents of the Town of Porterfield and former over 30 year residents of the Town of Peshtigo in the middle of a massive plume of PFAS contamination. We are writing today in support of setting standards for PFAS for drinking and ground water. For decades, PFAS compounds have been used unchecked -- the consequences for health, the environment, communities, and the economy are serious. In our instance a corporation made billions in profits while polluting with these dangerous compounds that truly cannot be cleaned up. This same corporation performed testing on PFAS products with out any safeguards even though it was known safety precautions were advised.

We raised our family in the Town of Peshtigo on the shores of Green Bay. Five years ago we sold our home to our daughter and son in law along with their three children. Soon after we sold our home, the massive PFAS contamination was known to the public - three years after the company knew. Our daughter's well now test as 60 ppt of combined PFAS compounds. The contamination is expanding and moving and will continue for years to come.

Our daughter's home is not a unique situation. Many many wells in the Town of Peshtigo are contaminated, the soil and air contamination in Marinette and the surrounding area are certain yet unknown. In the Town of Porterfield where we live many fields are contaminated with PFAS biosolids. The contamination happened and continues in our state because there are not standards for PFAS in drinking and ground water. Not having any regulation extremely limits options for residents, homeowners, and all Wisconsinites. Clean water is a most essential need -- these standards take a huge step towards ensuring that.

Please act now to set standards.

Bill and Cindy Verschay

W3490 Hardwood Road

Porterfield, WI 54159

verschay@gmail.com

.....

LWV Wisconsin <lwwisconsin@lwwwi.org>

Dear Bruce Rheineck and Adam DeWeese,

Please accept the attached document as the comment on behalf of the League of Women Voters of Wisconsin regarding SS 29-21 and SS 30-21 for proposed revisions affecting NR 140 and NR 809 to be entered into the public record.

If you have any questions, please let us know.

Sincerely,
The League of Women Voters of Wisconsin
lwvwisconsin@lwvwi.org
608-256-0827



612 W. Main Street, #200` Phone: (608) 256-0827
Madison, WI 53703 www.lwvwi.org

June 8, 2021

TO: Department of Natural
Resources Attn: Bruce Rheineck –
DG/5 Attn: Adam DeWeese –
DG/5
101 S. Webster
Street Madison, WI
53703



RE: Statements of Scope SS 029-21 and SS 030-21 for proposed revisions of NR 140 and NR 809 to include new standards for several pesticides and PFAS compounds

The League of Women Voters of Wisconsin (LWVWI) has long been a strong supporter of efforts to protect the environmental quality of our state, including the quality of our water. It is the League's position that access to clean drinking water is a fundamental human right. The LWVWI is therefore in support of any efforts to address PFAS and pesticide contamination of our ground and drinking water.

PFAS are a group of highly toxic and persistent compounds that bioaccumulate in animals and humans. Evidence has mounted linking PFAS to serious health problems, including cancer, liver damage, and developmental defects.

Because they dissolve in water, PFAS are highly mobile. They are therefore found in a variety of media, including surface water and groundwater which are the source of drinking water for animals and humans. Yet there is currently no comprehensive federal approach to PFAS contamination. Given the toxicity and wide-spread occurrence of these contaminants, several states are grappling with this problem and some have developed their own regulations. Specifically, our two neighboring states Minnesota and Michigan have adopted numerical standards for several of the PFAS compounds.

Wisconsin is currently in the rulemaking process to adopt a groundwater enforcement standard of 20 ppt for PFOA and PFAS combined (EIA currently pending) as part of 'Cycle 10'. [EPA is also combining PFOA and PFOS in its health advisory because they cause similar types of adverse health effects (*)]

As part of 'Cycle 11', DNR requested DHS to provide health-based groundwater standards for a list of substances. That list was revised in September 2019 to consist of 41 contaminants: 6 pesticides and 35 PFAS compounds. Most of these contaminants have already been detected in some medium in Wisconsin (drinking water, groundwater, soil); the remainder are considered to have a reasonable probability of entering the groundwater resources of the state.

In November 2020, after a detailed analysis of peer-reviewed scientific studies of the health effects of these contaminants, DHS provided recommendations for 22 contaminants: 6 pesticides and 16 PFAS compounds. DHS stated that "due to limited health information, we were not able to recommend standards" for more than half of the PFAS compounds contained in the DNR list. This is

clear evidence of the degree to which DHS scrutinizes the relevant scientific literature before using a study as a basis for a recommendation.

Of the 16 PFAS compounds for which DHS has developed standards, DHS recommends a combined enforcement standard for four of them, plus PFOA and PFOS which are already combined in 'Cycle 10'. The reason for combining them is that these four PFAS compounds are precursors, i. e. they degrade into PFOS and PFOA in the environment and in the human body. Combining all 6 PFAS compounds therefore makes science and medical-based sense.

The LWVWI also supports the proposed standards for 6 pesticides. These are toxic herbicides and insecticides that are applied to crops to control weeds and insects. They have been detected in a number of wells in Wisconsin.

The LWVWI believes that DHS has provided DNR with scientifically valid data on those contaminants to inform regulatory decisions and that DNR has the statutory authority to develop regulations that protect public health and the environment. The LWVWI therefore supports the proposed revisions to NR 140 and NR 809 contained in SS 29-21 and SS 30-21 to include new standards for 6 pesticides and 16 PFAS compounds.

Thank you for giving us the opportunity to comment on these two Scope Statements.

(*) Federal Register/Vol. 81, No. 101, p.33251

.....
From: Clean Water Action Council of Northeast Wisconsin <contact@cleanwateractioncouncil.org>
Sent: Thursday, June 10, 2021 11:18 AM
To: Rheineck, Bruce D - DNR <BruceD.Rheineck@wisconsin.gov>
Subject: RE: SS 029-21/SS 030-21.

Dear Mr. Rheineck:

Please see the attached letter regarding our comments on RE: SS 029-21/SS 030-21.

Dean

Dean Hoegger, President & Executive Director
920-421-8885
contact@cleanwateractioncouncil.org
P.O Box 9144
Green Bay, WI 54308
www.cleanwateractioncouncil.org
office at MAC Hall, A307, UWGB



*Clean Water Action Council
of Northeast Wisconsin*

P.O. Box 9144, Green Bay, WI 54308
www.cleanwateractioncouncil.org
Office: A307 MAC Hall, UWGB, 920-421-8885

June 8, 2021
Department of Natural Resources
Attn: Bruce Rheineck – DG/5
101 S. Webster St.
Madison, WI 53703

RE: SS 029-21/SS 030-21

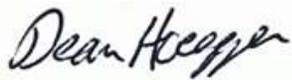
Dear Mr. Rheineck:

I am writing to you today to urge the Department of Natural Resources to adopt SS 029-21 and SS 030-21. It is in the best interest of the State of Wisconsin to move forward with these proposed rules. Evidence has shown that per- and polyfluoroalkyl (PFAS) chemicals have been linked to negative health effects including cancer, liver damage, decreased fertility, increased risk of asthma, increased risk of thyroid disease, and impairments to behavior, growth, and learning. PFAS are known as “forever chemicals” because they do not breakdown easily. They bioaccumulate in animals and humans, lasting for decades in the human body.

The Wisconsin Department of Health Services went through a rigorous science-based process to develop the recommendations for the 11th Cycle of Groundwater Standards. This took an extensive amount of time, research, and collaboration to develop. The adoption of these rules will serve as a key preventative measure to ensure access to clean and safe drinking water for all of Wisconsin. It is imperative that rules and standards are guided by science and prioritize preventative measures.

We need the State of Wisconsin to move forward. Without sufficient rules and standards in place, communities lack the ability to deal with contaminated water.

Respectfully,



Dean Hoegger
President & Executive Director
Clean Water Action Council of Northeast Wisconsin

Cw

.....
From: Samantha Stohlman <samantha@thewelchgroup.org>
Sent: Thursday, June 10, 2021 2:36 PM
To: Rheineck, Bruce D - DNR <BruceD.Rheineck@wisconsin.gov>

Cc: Welch, Bob <bob@thewelchgroup.org>

Subject: Wisconsin Corn Growers Association NR 140 Comments

Hi Bruce,

Please see the attached comments from the Wisconsin Corn Growers Association regarding DG-25-20.

Thank you,

Samantha Stohlman

Associate Lobbyist at TWG

Office: 608.819.0150

Personal: 248.648.9028

Wisconsin Corn Growers Association

N77W24707 Century Court

Lisbon, WI 53089

262-372-3289



June 10, 2021

Attn: Bruce Rheineck

Department of Natural
Resources DG/5 Department of
Natural Resources 101 S.
Webster Street
Madison, WI 53703

To Whom it May Concern:

The Wisconsin Department of Natural Resources (DNR) and the Department of Health Services (DHS) recently released NR 140 Cycle 11 proposed standards.

The Wisconsin Corn Growers Association (WCGA) supports regulatory systems based on sound, peer reviewed science and advocates for common sense practices to maintain or improve groundwater quality and soil health. WCGA feels the standards DHS has given to the DNR are not evidence based and fail to accurately address enforcement standards and preventative action limits for several pesticides.

WCGA believes DHS should use endpoint standards assessed by the U.S. Environmental Protection Agency and consistent with Wisconsin State Statute as a guide for Cycle 11 of NR 140.

Furthermore, stakeholders were not given any chance for input as DHS developed the proposed standards. Input is highly recommended when considering standards that directly affect corn growers and others in the agricultural industry across the state. This input for NR 140 has often been overlooked by the DNR and DHS in the past.

Please let us know if you have any questions or would like to address our concerns

further. Sincerely,
The Wisconsin Corn Growers Association

.....

STATEMENT OF SCOPE

Department of Natural Resources

Rule No.: DG-31-20

Relating to: Revisions to ch. NR 809 related to the promulgation of new drinking water maximum contaminant levels for 12 additional Per- and Polyfluoroalkyl Substances (PFAS) and combined standards for 4 PFAS.

Rule Type: Permanent

1. Finding/nature of emergency (Emergency Rule only):

The rules will be proposed as permanent rules.

2. Detailed description of the objective of the proposed rule:

The objective of the proposed rule is to amend ch. NR 809, Wis. Adm. Code, to establish drinking water standards, referred to as Maximum Contaminant Levels (MCLs), for 12 Per- and Polyfluoroalkyl substances (PFAS) and combined standards for 4 PFAS. Establishment of these MCLs is based on recommendations for health-based standards from the Department of Health Services (DHS) based on its review of scientifically valid technical information. On November 6, 2020, DHS transmitted the 11th Cycle of Groundwater Standards Proposals to DNR containing recommendations to establish groundwater standards for 22 substances including individual standards for 6 pesticides, individual standards for 12 per- and polyfluoroalkyl substances (PFAS), and combined standards for 4 PFAS.

PFAS contaminants have been identified as emerging contaminants by the EPA and numerous states, including Wisconsin, due to their persistence in and threats to the environment, including surface water and groundwater resources. The impacts to surface water and groundwater sources are threats to public health, welfare and safety in obtaining drinking water. Establishing drinking water standards for certain PFAS contaminants in this rule will protect public health by setting MCLs that may not be exceeded. If MCLs are exceeded, a corrective action plan must be implemented to maintain protection of public health, welfare and safety in drinking water.

Because of sampling conducted pursuant to the EPA's Unregulated Contaminant Monitoring Rule 3 (UCMR 3), the PFAS contaminants Perfluorooctanoic acid (PFOA) and Perfluorooctanesulfonic acid (PFOS) were identified in the drinking water at several Wisconsin public water systems. Subsequent environmental investigations throughout the state have identified several PFAS contaminant sources with impacts to the environment including the waters of the state. Additional drinking water monitoring of PFAS contaminants at several

Wisconsin public water supply systems since completion of UCMR 3 has identified additional PFAS impacts to several drinking water sources.

Adverse health effects have been associated with exposure to PFAS compounds based on several studies. Adverse health effects include an increase in cholesterol, liver damage, thyroid disease and a decrease in fertility and birth weight. The EPA and international studies have classified some PFAS as possibly carcinogenic to humans.

3. Description of the existing policies relevant to the rule, new policies proposed to be included in the rule, and an analysis of policy alternatives:

Chapter NR 809, Wis. Adm. Code, promulgated consistent with the Safe Drinking Water Act, contains drinking water standards (MCLs) for more than 90 regulated contaminants. The rule amendment to add 12 PFAS contaminants and combined standards for 4 PFAS to ch. NR 809, Wis. Adm. Code, is consistent with the existing policy in ch. NR 809, Wis. Adm. Code, to establish MCLs to provide minimum standards for the protection of public health, safety and welfare in the obtaining of safe drinking water. The amendment of ch. NR 809, Wis. Adm. Code, is the most efficient and effective policy alternative to add certain PFAS contaminants as regulated contaminants for the protection of public health, safety and welfare.

A policy alternative would be to wait until EPA promulgates MCLs for PFAS substances. It is unclear if or when EPA will do this, how many years it would take and for which PFAS compounds EPA would develop MCLs. WI DNR would have to promulgate PFAS MCLs for those compounds in ch. NR 809 in order to maintain primacy.

4. Detailed explanation of statutory authority for the rule (including the statutory citation and language):

Under s. 281.17(8)(a), Wis. Stats., “the department may establish, administer and maintain a safe drinking water program no less stringent than the requirements of the safe drinking water act, 42 USC 300f to 300j-26.” Establishment of drinking water MCLs to add 12 PFAS contaminants and combined standards for 4 PFAS, is consistent with the objectives of the EPA’s Safe Drinking Water Act (Title 40, Chapter 1 Subchapter D Part 141 National Primary Drinking Water Regulations) and ch. NR 809, Wis. Adm. Code. The purpose of ch. NR 809 is to establish minimum standards and procedures for the protection of public health, safety and welfare in obtaining safe drinking water.

Ch. NR 809, Wis. Adm. Code, is adopted under authority granted in chs. 280 and 281, Wis. Stats. Related statutory authority includes:

Section 280.11(1), Wis. Stats., Pure drinking water. Provides department authority, after a public hearing, to prescribe, publish and enforce minimum reasonable standards and rules and regulations for methods to be pursued in the obtaining of pure drinking water for human consumption and the establishing of all safeguards deemed necessary in protecting the public health against the hazards of polluted sources of impure water supplies intended or used for human consumption. The department has general supervision and control of all methods of

obtaining groundwater for human consumption including sanitary conditions and generally to prescribe, amend, modify or repeal any rule or regulation theretofore prescribed and shall do and perform any act deemed necessary for the safeguarding of public health.

Section 281.12, Wis. Stats., provides that the department has general supervision and control over the waters of the state and is to carry out the planning, management and regulatory programs necessary for implementing the policy and purpose of ch. 281, Wis. Stats., including to protect, maintain and improve water quality. The department also shall formulate plans and programs for the prevention and abatement of water pollution and for the maintenance and improvement of water quality.

5. Estimate of amount of time that state employees will spend developing the rule and of other resources necessary to develop the rule:

The department estimates that approximately 925 hours of staff time will be required to complete the proposed rule.

6. List with description of all entities that may be affected by the proposed rule:

The proposed rule will affect the following entities:

- Municipal community water systems (cities, townships, sanitary districts)
- Other-than-municipal community water systems (mobile home parks, apartment buildings, condominium associations)
- Non-transient Non-community water systems (small businesses with 25 or more employees that are not on a municipal source)
- Laboratories certified to perform PFAS analysis in drinking water
- Wisconsin Department of Natural Resources
- Wisconsin Department of Health Services
- Wisconsin Department of Safety and Professional Services
- Treatment installation businesses

7. Summary and preliminary comparison with any existing or proposed federal regulation that is intended to address the activities to be regulated by the proposed rule:

The process for the proposed amendment to ch. NR 809, Wis. Adm. Code, to establish certain MCLs for PFAS contaminants is consistent with the process for establishing rules for other drinking water contaminants regulated under the federal EPA Safe Drinking Water Act, specifically Title 40 - Protection of the Environment; Chapter 1 - Environmental Protection Agency; Subchapter D - Water Programs. The department has a primacy agreement with the EPA to implement the Safe Drinking Water Act.

As a result of findings from EPA's UCMR 3 national monitoring of public water supply systems, the EPA issued a Health Advisory Level (HAL) for two PFAS contaminants, PFOA and PFOS,

in 2016. A HAL of 70 parts per trillion (ppt) for PFOA and PFOS, individually or combined, were established based upon laboratory animal and epidemiological human studies indicating adverse health effects related to PFOA and PFOS exposure. These studies were conducted prior to 2016; more recent human health studies are available. Adverse health effects included developmental effects of fetuses during pregnancy or to breastfed infants, cancer, liver effects, immune effects and thyroid effects and other health effects. During EPA's UCMR 3 national monitoring of public water supply systems, additional PFAS were also monitored as emerging contaminants including perfluorobutanesulfonic acid (PFBS), perfluorohexanesulfonic acid (PFHxS), and perfluorononanoic acid (PFNA). Additional PFAS emerging contaminants continue to be evaluated by the EPA for adverse health effects in humans similar to PFOA and PFOS. In 2018, the Agency for Toxic Substances and Disease Registry, a branch of the Center for Disease Control and Prevention, issued a draft report based on more recent PFAS human health studies. In that draft report, the proposed ATSDR "minimum risk levels" or MRLs, translate roughly to 7 ppt for PFOS and 11 ppt for PFOA.

In February 2019, the EPA released a Per- and Polyfluoroalkyl Substances (PFAS) Action Plan. One of the four primary actions in the PFAS Action Plan is initiating steps to evaluate the need for MCLs as part of the Safe Drinking Water Act. The EPA PFAS Action Plan proposes to characterize potential health impacts from a broader set of PFAS. The EPA is working on or has begun toxicity work on a number of PFAS emerging contaminants including GenX chemicals and PFBS in addition to PFBA, PFHxA, PFHxS, PFDA, and PFNA.

In February 2020, EPA announced that it is proposing to regulate both PFOA and PFOS under the Safe Drinking Water Act. This preliminary determination is a step toward providing state and local communities with key information about PFOA and PFOS in drinking water. In the proposal, EPA is also asking for information and data on other PFAS substances, as well as seeking comment on potential monitoring requirements and regulatory approaches EPA is considering for PFAS chemicals. If the positive regulatory determination is finalized, the agency would begin the process to establish a national primary drinking water regulation for PFOA and PFOS, which could take 3 to 5 years.

8. Anticipated economic impact of implementing the rule (note if the rule is likely to have an economic impact on small businesses):

We anticipate the economic impact of this rule to stakeholders including small businesses to be significant, and will be greater than \$10 million in any two-year period. In the absence of adequate testing data for these PFAS contaminants, the department cannot predict the number of systems that will have to spend money to mitigate these contaminants at this time. The department may have more information in preparation for the required Economic Impact Analysis later in the rule making process.

Testing will be required at a frequency similar to other synthetic organic compounds having Safe Drinking Water Act MCLs. This testing would occur at least every six years, but may be as often as every quarter for a small subset of public water systems, depending upon the levels of PFAS contaminants detected. This will affect approximately 2,000 public water systems. Currently the cost of this analysis is \$375 per sample.

The number of systems needing to treat their water or drill a new well due to an attainment or exceedance of one or more of the PFAS MCLs is unknown at this time. Some communities may have detections of any one or more PFAS MCLs, but not attain or exceed one of the PFAS MCLs. When needed, the cost of treatment at a large municipal public water system could be at least \$25 million; however that figure could be much lower at smaller systems. Some systems may also choose to drill a new well if it is possible to find an uncontaminated aquifer. Others may elect to take a well off line if sufficient capacity is available based on the other wells in the system. Where there is a known entity responsible for the contamination, the state would request that the responsible party pay for the costs of responding to the contaminated well. The typical cost of a well at a non-transient non-community system is approximately \$11,000.

The economic benefits of avoiding negative human health effects may greatly outweigh the costs of treating the water or drilling a new well. The department is still assessing the extent of the economic impact of the rule, but it is projected to be significant in the first few years of implementation and more moderate in later years once initial up-front treatment installation costs are covered.

9. Anticipated number, month and locations of public hearings:

The department anticipates holding 5 public hearings in September 2022. Hearings will be held simultaneously by videoconference. Anticipated hearing locations are Madison, Rhinelander, Superior, Marinette, and La Crosse.

The department will hold these hearings to gather stakeholder input on a rule package that is used widely statewide.

Contact Person: Adam DeWeese, (608) 264-9229

DocuSigned by:

6783A7BA427C4CD...
For Preston D. Cole, Secretary
1/8/2021 | 8:16 AM CST
Date Submitted



Tony Evers

Office of the Governor | State of Wisconsin

March 4, 2021

By Electronic Mail Only

Dear Secretaries and Agency Heads:

On this day, I approved the following statements of scope pursuant to Wis. Stat. § 227.135(2):

- A statement of scope by the Department of Natural Resources, submitted January 8, 2021, relating to revisions to ch. NR 809 related to the promulgation of new drinking water maximum contaminant levels for 12 additional Per- and Polyfluoroalkyl Substances (PFAS) and combined standards for 4 PFAS (Wis. Admin. Code ch. NR 809); and
- A statement of scope by the Department of Natural Resources, submitted January 8, 2021, relating to amendments to ch. NR 140 to set numerical standards to minimize the concentration of polluting substances in groundwater (Wis. Admin. Code ch. NR 140).

On this day, I approved the following proposed administrative rule pursuant to Wis. Stat. § 227.185:

- A proposed rule by the Department of Public Instruction, submitted February 11, 2021, relating to sensory impairment terminology and deafblindness (Wis. Admin. Code ch. PI 11).

Please direct any questions about this letter to my deputy policy director, Katie Domina.

Sincerely,

A handwritten signature in black ink that reads 'Tony Evers'.

Tony Evers
Governor

cc: Ryan Nilsestuen, chief legal counsel (ryan.nilsestuen1@wisconsin.gov)
Katie Domina, deputy policy director (katherine.domina1@wisconsin.gov)
DOA State Budget Office (SBOAdminRules@spmail.wi.gov)
Emma Esch, DNR (emma.esch@wisconsin.gov)
Carl Bryan, DPI (carl.bryan@dpi.wi.gov)