

August 27, 2019

Madison Water Utility Board
119 E. Olin Ave
Madison, WI



Dear Board Members:

We are writing to recommend, as we did in our [July 23 comments](#), that you **direct the Water Utility to adopt the Vermont PFAS standard of 20 ppt for five PFAS compounds (list) as an interim standard** while state and federal agencies develop and promulgate standards—a contentious political process that will take years.¹ After adopting the Vermont standard, Well 15 (which in testing to date has a maximum of 34 ppt of the five PFAS Vermont considers), should not be put back in service without PFAS mitigation.²

In our July 23 letter, we also asked that information about two important PFAS issues be brought to the Water Utility Board for discussion: 1) documented PFAS contamination in groundwater beneath Reindahl Park next to Well 15; and 2) documented PFAS contamination at the former Burke Sewage Treatment plant site a little over a mile southwest of Well 15. Both of these PFAS sources could be related to Well 15 PFAS contamination.

We also ask that a third issue be brought before the Board at a future meeting: the use of PFAS foams by the Madison Fire Department. After the MGE transformer fire, the Madison Fire Department (MFD) told the city, based on information from the manufacturer of the foam (called FireAde) that the foam used on the fire did not have PFOA and PFOS, and it only contained the “environmentally friendly” PFHxA.³

However, [test results](#) after the fire revealed that this information was substantially incorrect—finding PFOA & PFOS as well as numerous other PFAS compounds at significant levels. One

¹ At the August 19 Water Utility Technical Advisory Committee meeting, most committee members seemed to agree that Vermont standard was reasonable, but at the end of the meeting a couple members expressed reluctance to recommend it because they don’t know its scientific basis. It is troubling that they came to this meeting—at which the decision about how to address Well 15 and consideration of the Vermont standard as an option were key issues they were to address—without reviewing this relatively short document. MEJO has repeatedly included links to the Vermont standard document in comments sent to the Board.

² TAC members seemed to be leaning toward granulated activated carbon (GAC) as the best option for Well 15 for several reasons. We do not know enough to recommend a specific treatment approach right now, but recommend that the chosen PFAS mitigation system (and associated waste disposal methods) be: fully protective of human and ecological health, prevent toxic emissions, be readily and effectively monitored, provide long term effectiveness and permanence, not create more toxic by-products and PFAS wastes that do not already have an authorized treatment plan. The mitigation approach also should be accepted by people in the Well 15 service area, and any waste products from the process (including those sent elsewhere) should be accepted by communities, tribes and indigenous peoples who are both directly and indirectly impacted.

³ The claim that this compound is “environmentally friendly” is based on the unfounded argument that shorter chain PFAS compounds (PFHxA is a six-carbon compound and considered “shorter”) are less toxic and harmful than longer chain PFAS compounds. This [article](#) describes some growing evidence that this claim, often touted by PFAS compound manufacturers, is unfounded and likely incorrect.

PFAS compound, 6:2 fluorotelomer sulfonic acid, was found in a surface water sample on the site at levels of 790 ppt.

This issue is of importance to the Water Utility because eventually these PFAS compounds will end up in groundwater under the Isthmus. Also, if the Madison Fire Department is using this type of firefighting foam on fires in Madison, this will be a repeated and ongoing source of PFAS to soils, surface waters, and groundwater in the city.

Consequently, we feel that it is in the Water Utility's interests to get more information from the MFD about their continued use of FireAde foam and details about PFAS in any other foams they use. The Water Utility and City should urge MFD to move toward fluorine-free firefighting foams as soon as possible.⁴

Please add the above three items to future Water Utility Board meeting agendas. We will also urge other city, county, and state agencies to address these issues, as they will affect PFAS discharges into surface water, stormwater, lakes, air and fish as well as groundwater. The uses of these highly toxic PFAS firefighting foams also pose substantial health risks to firefighters and EMT personnel.

Sincerely,

/s/ Maria Powell, PhD
Executive Director

⁴ As far as we understand, civilian fire departments are not required by law to use fluorine foams (as the airport/Truax are currently, per FAA regulations—though environmental organizations and federal-level elected officials are working to change this).



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August 27, 2019

Madison Water Utility Board
119 E Olin Ave
Madison, WI 53713

RE: Turning on Well 15

Board Members:

Midwest Environmental Advocates (MEA) is a nonprofit environmental law center located in Madison. MEA represents residents of Madison on a regular basis, a majority of our employees are residents of Madison, and many of our family and friends live in the Well 15 service area. In addition, numerous citizens from Madison and around the state have reached out to our organization with concerns about per- and polyflouroalkyl substances (PFAS).

MEA understands that the Madison Water Utility Board is considering whether to bring Well 15 back online for service to Madison residents. Given the total concentration of PFAS compounds detected in Well 15, Well 15 should not be brought back online until treatment technologies capable of reducing those concentrations to safe levels can be installed. MEA understands that such treatment technologies are expensive, that the approval process can be lengthy, and that there could be water shortages during dry months, but the health of Madison residents must be the utmost priority.

Although the concentrations in Well 15 of PFOA and PFOS (11-12 ppt) are below the Wisconsin Department of Health Services' (DHS) recent groundwater recommendation of 20 ppt, those levels exceed the recommended preventive action limit for those compounds, which is 2 ppt. In addition, the Wisconsin Department of Natural Resources has referred other PFAS compounds detected in Well 15 to DHS for groundwater recommendations. Those recommendations will likely not be ready until next year. In the meantime, the Board should look to standards established in other states such as Vermont, whose standards are already exceed by the total concentration of PFAS compounds in Well 15.

For these reasons, MEA strongly urges to Board to:

1. Adopt Vermont standards until DHS makes recommendations for additional PFAS compounds detected in Well 15; and

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2. Keep Well 15 offline until adequate treatment technologies are installed or DHS recommendations show total PFAS concentrations to be safe.

Please feel free to reach out with any questions or concerns you have about our comments.

Sincerely,

/s/

Rob Lee

Attorney / Shaffer Fellow

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From: Claire Gervais

Sent: Tuesday, August 27, 2019 12:15 AM

To: Water <water@cityofmadison.com>

Cc: Maria Powell (MEJO) <mariapowell@mejo.us>; WEHN Strg Comm <wehn-steering-committee@googlegroups.com>; Laura Olah <info@cswab.org>; Ashleigh Ross <aross@edgewood.edu>

Subject: PFAS Standards - Public Comment

Hello Water Utility Board Members,

I would like to submit a few short comments about PFAS standards. Given what we DO know about PFAS, the Precautionary Principle should apply, so like Vermont, we should adopt the strictest standards of 20 ppt for five PFAS ASAP and based on that, refrain from using Well 15 without treatment to remove the PFAS.

I wish I had time to explain further, but hope ALL public health officials will come together and agree that this is an urgent public health issue and that the strictest standards should be adopted to put public health first.

Claire Gervais, MD, Associate Professor
UW Department of Family Medicine and Public Health
President, Wisconsin Environmental Health Network