



October 22, 2019

Dear Water Utility Board members:

I am writing about agenda item 5—PFAS update.

Firstly, we thank the Board for responding to [our request back in February](#) to direct the Water Utility to test all of the Madison wells for 24-30 PFAS. This has provided very useful information that will help the city better protect residents from PFAS exposures in drinking water and understand sources of PFAS to city wells and other areas.

We also thank Joe Grande for writing a comprehensive and clear report summarizing the PFAS well data gathered to date. PFAS risks and analytical results are extremely complex and challenging to understand and communicate clearly, especially given analytical inconsistencies, data gaps, unknowns, and uncertainties. Despite these significant challenges, Joe’s work on this issue has been excellent and thorough. We appreciate that.

Public transparency & engagement issues

However, MEJO is concerned about lack of transparency about PFAS well results. In particular, we raised questions when PFAS well data was released publicly last spring and several compounds detected at lower levels were reported as “present” in wells rather than listing detection and/or reporting limits for these compounds (the standard reporting format). At that point we asked for the lab reports to see these details and our requests were treated as open records requests, with some delay in response even though the Utility has these reports readily available. More recently, we asked for the lab reports for the results just released but haven’t received them yet.

Madison residents, Water Utility’s customers, should not have to file open records requests to get full lab analytical reports about contaminants in water they pay for and drink daily. Further, I was told in a May 20, 2019 email from the WU (after I inquired about the lab reports) that the final well PFAS report “will include the full laboratory analysis including all the detailed information that you describe in your inquiry.” However, the final report under review today does not include the full lab reports for all the wells or links to them.

We are also concerned about public access to minutes from WU Technical Advisory Committee meetings, where extremely important discussions occur about assessing and managing contaminants in our drinking water. Since the usual note taker (Maria Van Aartsen) has been promoted, it is not clear if anyone is taking notes and/or whether and how any notes taken will be available to interested residents.

Finally, we work with many people living in the Well 15 service area who are concerned about the quality of the water they are currently drinking now that Well 15 is off, the potential for this well to be turned back on in the future, and whether they will be informed and engaged in this decision.

Following from the above, we ask the Board to:

1. Please direct the Water Utility to provide links to all the lab reports for the 2019 PFAS well testing in the final report or on the WU website so interested public can access them.
2. Please ask the Water Utility to describe in writing: What will the Water Utility's decision-making process be related to the future use of Well 15? How will the public, especially those in the Well 15 service area, be informed and engaged in this decision if/when it occurs?
3. Please ask the Water Utility to describe in writing the status of the Technical Advisory Committee minutes: Who is currently taking minutes? Where will they be posted? How they will be made available to the public?

Some further comments/questions on today's PFAS report recommendations:

1. We agree with Water Utility's recommendation to use "modified EPA method 537.1" rather than EPA Method 537.1 (as previously suggested at a TAC meeting) in order to understand a wider range of PFAS present in wells. However, we are unclear about the last bullet point, "Use EPA Method 537.1 if directed by US EPA or Wisconsin DNR unless the modified method has been designated an "equivalent or better" method for PFAS analysis in drinking water." This seems to suggest that if DNR or EPA decide that EPA Method 537.1 is the approved method, the Water Utility will have no choice but to use that method—so the Utility would backslide to measuring fewer PFAS compounds in wells even if more are there (that it previously tested for). Is this correct? Can someone please clarify what this bullet point means?
2. We agree that all wells should be tested at least once in 2020, though once a year seems too sparse. At the least, we propose that the fourteen wells found to have at least one PFAS be tested at least twice in 2020 in different seasons (we understand that some of these are seasonal wells and Well 15 is currently off, so this may vary a bit per well).

Thank you for considering our comments and questions.

Sincerely,

/s/ Maria Powell

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