



Testimony on Adopting PFAS Standards for Drinking, Ground and Surface Water
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My name is Cheryl Nenn, and I'm the Riverkeeper for Milwaukee Riverkeeper. We are a non-profit organization, founded in 1995, to protect water quality and wildlife habitat and advocate for sound land use in the Milwaukee River Basin and nearshore Lake Michigan. Our vision is for clean, fishable, swimmable, and drinkable waters that are used and enjoyed by everyone in our community. On behalf of Milwaukee Riverkeeper and our thousands of volunteers and members, we support DNR's proposed rules to establish public health standards for PFOA and PFOS in drinking water, groundwater, and surface water (DG-24-19, DG-15-19 and WY-23-19).

PFAS contamination threatens the waters, fish and wildlife, soils/sediment, and public health of our communities. PFAS accumulates in blood, tissue and organs; concentrates in breast milk; and is linked to several cancers (kidney, breast, testicular, liver, etc.) and autoimmune diseases. In the Milwaukee area, extensive PFAS contamination has been documented at General Mitchell Airport and the adjacent National Guard/former US Air Force properties, largely from the use of PFAS-containing firefighting foams. PFAS has contaminated local groundwater, the Kinnickinnic River, and downstream rivers and Lake Michigan, which is the source of drinking water for over 1 million people in southeast Wisconsin. In addition, widespread PFAS contamination has been found in 100% of water samples as well as soil and fish samples from the entire Milwaukee River Estuary.

Without comprehensive testing requirements for PFAS, which these rules would provide, we don't really know how widespread exposure to PFAS chemicals might be, and we have no standards for cleaning up existing pollution. The City of Milwaukee has been doing some testing of drinking water for PFOA and PFOS, but there is little information for other drinking water utilities in the Milwaukee River Basin. There is some evidence of groundwater contamination adjacent to the West Bend Air Support Facility, for example, but no widespread testing has occurred of local drinking water supplies. Given the amount of past and current industry in southeast Wisconsin, we suspect that we will find additional areas of PFAS contamination within the Milwaukee River Basin. It is our understanding that only 1% of drinking water utilities have been tested in Wisconsin. Once we have this information, we will be able to prioritize resources toward reducing sources of PFAS and remediating contamination that poses a threat to human health. For example, less than 5% of drinking water utilities tested for PFAS in Michigan resulted in positive results for PFAS; we need to put our arms around this problem and act. Wisconsin residents deserve to know if their water is safe for their families to drink and if their fish are safe to eat.

We can not and must not wait for federal standards for PFAS chemicals. Federal standards are not eminent. If we wait for federal standards, our Wisconsin communities will be without protections from these toxic chemicals in our drinking water for at least 5 years and likely much longer. It's also

important to note that while the EPA set standards for about 100 drinking water contaminants between 1975 and 1992 under the Safe Drinking Water Act, not one new standard has been added since 1996 after a “new” process was created to regulate contaminants! EPA studied 25 unregulated contaminants in the last few decades and decided not to regulate 24 of them. In 2011, EPA announced that it would regulate perchlorate—the 25th contaminant—which was endangering developing brains of fetuses and infants, but failed to meet statutory deadlines and standards never went into effect. Last year, EPA announced its preliminary decision to regulate PFOA and PFOS. But without major changes to the Safe Drinking Water Act, we are concerned that history may repeat itself. Also, the EPA does not have a federal process to establish groundwater standards at the current time. We cannot wait for the federal government to act, and we remain far behind in addressing this problem as compared to adjacent states like Minnesota, Illinois, and Michigan.

These science-based rules are based on peer-reviewed science, and these protective standards for PFAS are popular and would protect Wisconsinites from only 2 of the best studied PFAS chemicals. Almost every Wisconsinite who testified at the 3 public hearings were in favor of these rules, and many of them already are suffering from severe PFAS contamination that has made their drinking water unsafe in places like French Island, Campbell, Peshtigo, Madison, Rhinelander, LaCrosse, and Wausau. Surface water discharge requirements will impact a small number of wastewater treatment plants and industrial facilities. These rules are only opposed by a few special interest groups that lobby routinely for polluting industries and short-term profits instead of the health of Wisconsinites. These industry groups do not speak for or even consider impacts of these chemicals to Wisconsinites, let alone sensitive populations that are most impacted by PFAS contamination including communities of color, pregnant women, children, and subsistence fishermen, among others. Protecting our water is also good for business, especially our \$10 billion outdoor tourism economy, which is largely based on clean water and plentiful fishing and hunting opportunities.

As members of the Natural Resources Board, you have the power to approve these standards to protect our water resources as well as the health of current and future generations. If these rules do not pass, thousands of Wisconsin families will continue to drink poisoned water, eat contaminated fish, and risk their health—perhaps unknowingly—for many years to come. Please pass these proposed rules for PFOA and PFOS in our drinking water, surface water, and groundwater.

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