



**Testimony on Scope Statement for PFAS Groundwater Standard Rulemaking**  
**Statement of Scope SS 008-25**  
**Cheryl Nenn, Riverkeeper**  
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My name is Cheryl Nenn, and I'm the Riverkeeper for Milwaukee Riverkeeper. We are a non-profit organization working 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 plans to establish public health standards for six PFAS (PFOA, PFOS, PFBS, PFNA, PFHxS and GenX) in groundwater to ensure clean, drinkable water for Wisconsinites.

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. New PFAS health advisories from the US EPA suggest that PFAS chemicals are harmful to human health even at very low levels, at the level of detection.

This is the third attempt to pass these important groundwater standards in the State of Wisconsin. We support using enforcement standards that are in line with stringent federal water quality criteria for these 6 PFAS chemicals passed last year. Given that the science around these standards has been well established, both by WDNR and the USEPA, we hope these standards can be passed quickly and not take the entire 3-year rulemaking window. The DNR also needs to work with the legislature and NRB to ensure these important regulations can move forward despite the REINS act issues that have held it back in past sessions. Economic considerations shouldn't be allowed to outweigh important regulations needed to protect public health in Wisconsin.

Approximately 1/3 of people in the Milwaukee River Basin still rely on groundwater for drinking, 2/3rds of Wisconsinites get their drinking water from groundwater, and 1/3 of Wisconsin residents get their drinking water from private wells that are not subject to regulations pertaining to public water systems. There are no federal standards for PFAS in groundwater so state standards are imperative. Once statewide groundwater standards have been established, the DNR will be able to test for PFAS, work with PFAS sources and dischargers to comply with preventive action limits, prohibit activities causing an exceedance, and require cleanups where necessary. The important work of source reduction will be made more difficult if not impossible without state groundwater standards.

Groundwater and surface water are connected. 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, including PFHxS at

extremely high concentrations, has contaminated local groundwater, and is also contaminating the Kinnickinnic River, which runs downstream to Lake Michigan, which is the surface water supply for over 1 million people in SE Wisconsin. In addition, we recently found out that West Bend's groundwater supply is significantly contaminated with PFAS, and working with DNR and the State, they are now installing a carbon filter to protect local water supplies. It is likely nearby private wells could also be similarly contaminated with PFAS but those Wisconsinites are not testing yet for PFAS or being advised by well testing/repair companies as to their risk, like they are with nitrates, bacteria, and 146 other contaminants already regulated by the State. We are also seeing groundwater contamination issues in the Saukville and Grafton areas of our watershed.

We support the DNR's Scope Statement to pass protective groundwater regulations for these 6 PFAS chemicals as soon as possible to protect our communities, waterways, and wildlife from these forever chemicals. Thank you.

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