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May 18, 2021

Christine Haag, Director Remediation and Redevelopment Program Department of Natural Resources 101 S Webster St, Box 7921 Madison, WI 53703

Subject: Update to 2018 DHS letter addressing PFAS and water use for gardening within the Town of Peshtigo, city of Marinette, and surrounding communities

Dear Ms. Haag,

In 2020, the Wisconsin Department of Health Services (DHS) released groundwater quality enforcement standard recommendations for several perfluoroalkyl and polyfluoroalkyl substances (PFAS), which are summarized in Table 1 and 2 (see Appendix).

Recently, the Wisconsin Department of Natural Resources (DNR) asked DHS if advice in a 2018 DHS letter on use of non-potable private well water for gardening in the city of Marinette and town of Peshtigo was still current in light of the new groundwater standard recommendations.

The original 2018 memo, sent to the city of Marinette and Town of Peshtigo, recommended that non-potable private wells with PFOA and PFOS levels at or above the Environmental Protection Agency's (EPA) 70 parts per trillion (ppt) drinking water health advisory should not be used for gardening. The present letter provides updated advice based on DHS's 2020 issued groundwater standard recommendations, supplanting our previous advice on this topic.

For <u>affected areas</u> within the Town of Peshtigo, City of Marinette and surrounding communities, DHS recommends that sources of water with PFAS levels below DHS's recommended groundwater standards be used for watering fruit and vegetable gardens to avoid small amounts of exposure to PFAS.

DHS continues to receive questions about whether PFAS in water get into the plants we eat. We also continue to review the research on the health effects of PFAS. Overall, the available research indicates that most garden plants are a *minor* source of PFAS exposure and that drinking PFAS contaminated water continues to be the most common source of exposure.

For other non-potable uses, such as pools, levels of PFAS above the DHS groundwater standard recommendations may be acceptable. Please contact DHS for additional advice if your well is above the DHS's recommended enforcement standards.

Additional information on PFAS contamination in Marinette, Peshtigo, and surrounding communities is available at: https://dnr.wisconsin.gov/topic/Contaminants/MarinetteFAQ.html.

More information on PFAS and human health effects is available at: https://www.dhs.wisconsin.gov/chemical/pfas.htm

If you have any questions regarding the information contained in this letter, please contact me at the email address below.

Sincerely,

Brita Kilburg-Basnyat, PhD

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Toxicologist

Bureau of Environmental & Occupational Health

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Attachments

- 1. Individual DHS recommended groundwater standards for PFAS
- 2. Combined DHS recommended groundwater standards for PFAS

cc: Bridget Kelly, Program Coordinator for Emerging Contaminants

Alyssa Sellwood, Complex Sites Program Manager

Molly Bonjean, Health Officer, Marinette County Public Health

Steve Genisot, Mayor, City of Marinette

Ken Keller, City Council Member, Ward 1, Marinette City Common Council

Jeffery Skorik, City Council Member, Ward 2, Marinette City Common Council

Doug Oitzinger, City Council Member, Ward 3, Marinette City Common Council

Dave Anderson, City Council Member, Ward 4, Marinette City Common Council

Liz Mikutowski, City Council Member, Ward 5, Marinette City Common Council

Debbie Klegin, City Council Member, Ward 6, Marinette City Common Council

Rick Polzin, City Council Member, Ward 7, Marinette City Common Council

Jason Flatt, City Council Member, Ward 8, Marinette City Common Council

Dorothy Kowalski, City Council President and Member, Marinette City Common Council Clarence Coble, Clerk, Town of Peshtigo

Cindy Boyle, Chairperson, Town of Peshtigo Board of Supervisors

Cindy Baur, Supervisor 1 Buildings and Grounds, Town of Peshtigo Board of Supervisors

Jon Drees, Supervisor 2 Roads, Town of Peshtigo Board of Supervisors

Kristen Edgar, Supervisor 4 Recycling, Town of Peshtigo Board of Supervisors

Kayla Furton, Supervisor 3 Roads, Town of Peshtigo Board of Supervisors

 $\begin{tabular}{ll} \textbf{Table 1. Individual DHS recommended groundwater standards} \\ \textbf{for PFAS}^1 \end{tabular}$

IOI I FAS	
PFAS Substance	Enforcement Standard (ng/L)
Perfluorotetradecanoic acid (PFTeA)	10,000
Perfluorobutanoic acid (PFBA)	10,000
Perfluorohexanoic acid (PFHxA)	150,000
Perfluorononanoic acid (PFNA)	30
Perfluorodecanoic acid (PFDA)	300
Perfluoroundecanoic acid (PFUnA)	3,000
Perfluorobutanesulfonic acid (PFBS)	450,000
Perfluorohexanesulfonic acid (PFHxS)	40
Perfluorododecanoic acid (PFDoA)	500
Hexafluoropropylene oxide dimer acid (HFPO-DA; GenX*)	300
Perfluorooctandecanoic acid	400,000
(PFODA)	
4,8-Dioxa-3H-perfluorononanoic acid	3,000
(DONA)	

¹ DHS recommended Groundwater Standards for per- and polyalkyl substances (PFAS) were made by DHS on November 6, 2020 and are currently undergoing rulemaking; please refer to https://www.dhs.wisconsin.gov/water/gws-cycle11.htm for additional information.

Table 2. Combined DHS recommended groundwater standard for $PFAS^2 \\$

DEACC L.A.	T. C
PFAS Substance	Enforcement Standard
	(ng/L)
Perfluorooctanoic acid (PFOA)	20 *
Perfluorooctanesulfonic (PFOS)	20 *
Perfluorooctane sulfonamide (FOSA)	20 *
N-Ethyl Perfluorooctane sulfonamide	20 *
(NEtFOSA)	
N-Ethyl perfluorooctane sulfonamidoacetic	20 *
acid (NEtFOSAA)	
N-Ethyl perfluorooctane	20 *
sulfonamidoethanol (NEtFOSE)	

^{*}Applies to the sum of FOSA, NEtFOSA, NEtFOSA, NEtFOSE, PFOS, and PFOA

² DHS recommended Groundwater Standards for per- and polyalkyl substances (PFAS) were made by DHS on November 6, 2020 and are currently undergoing rulemaking; please refer to https://www.dhs.wisconsin.gov/water/gws-cycle11.htm for additional information.