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October 28, 2019

Darsi Foss, Administrator  
Division of Environmental Management  
Department of Natural Resources  
101 S Webster Street, Box 7921  
Madison, WI 53703-7921

**Subject: Revised timeline for recommendations for state groundwater quality standards**

Dear Ms. Foss,

Thank you for the September 18, 2019 letter clarifying PFAS compound names and abbreviations for the Cycle 11. Given the clarifications you provided to standardize the PFAS substances names and abbreviations included in Cycle 11, we took this opportunity to rescreen the amount of technical information available for the substances.

In this revised screen, we looked to see if sufficient technical information may be available to set a groundwater standard for this substance. As such, we looked to see if any federal agencies have established health-based values for the substance, if there have been any peer-reviewed studies evaluating the toxicity of the compound, and if any other states or countries have established drinking water or groundwater standards for the substance.

Based on our updated screen, we have determined that further review is warranted for twenty-six of the substances on the list, six more than previously indicated in our May 24, 2019 letter to DNR (see Revised Screening Summary below). Our recommendation is to include these additional substances in our current review. This would shift our proposed timeline later by one month to allow time for this review.

**Proposed timeline**

- Substances in Category II with technical information completed by September 2020.<sup>1</sup>
- Substances in Category III with technical information completed by December 2020.

An alternative option is to not include these six substances in this cycle and proceed with the original timeline.

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<sup>1</sup> Per DNR's April 10, 2019 request: Category II substances are those that have been detected in groundwater but not in excess of a federal number, or detected in groundwater and no "federal number" is established. Category III substances are those with a reasonable probability of being detected in groundwater.

To ensure completion of the recommendations for substances with technical information or other standards in a timely manner, we do not intend to revisit the fourteen substances without available technical information or other state/international standards before the completion of this cycle.

**We look forward to your response on how to proceed with the six substances described above** and continue to enjoy working together on this effort to protect and promote the health and safety of the people of Wisconsin.

Sincerely,



Jeanne F. Ayers, RN, MPH  
Administrator  
Division of Public Health

cc: James Zellmer, Deputy Administrator, DNR Division of Environmental Management  
Bart Sponseller, Deputy Administrator, DNR Division of Environmental Management  
Steve Elmore, Director, DNR Bureau of Drinking Water and Groundwater  
Bruce Rheineck, Chief, DNR Groundwater Section  
Chuck Warzecha, Deputy Administrator, Division of Public Health  
Mark Werner, Director, Bureau of Environmental and Occupational Health  
Jon Meiman, Chief Medical Officer, Bureau of Environmental and Occupational Health  
Sara Walling, Administrator, DATCP Agricultural Resource Management Division  
Lori Bowman, Director, DATCP Agrichemical Management Bureau  
Laura Olah, Citizens for Safe Water Around Badger

## Cycle 11 Revised Screening Summary

DHS searched for each Cycle 11 substance on EPA's chemistry dashboard, reviewed available health information from the EPA or Agency for Toxic Substances and Disease Registry (ATSDR), reviewed the interstate technical regulatory council (ITRC) webpage for other state/international standards, and conducted a literature search for available toxicity studies. If health information, other state or international standards, or at least one toxicity study in rodents was not located, we considered the chemical to not have sufficient technical information for formulating a recommended groundwater standard. For that reason, DHS recommends that review of those substances for which there is insufficient technical information be deferred to a future cycle when additional information could be available.

	Abbreviation	Name	CAS RN	Additional review needed	
Category II (detected in groundwater)		Metalaxyl	57837-19-1	Yes	
		Chlorantraniliprole	500008-45-7	Yes	
		Flumetsulam	98967-40-9	Yes	
		Fomesafen	72178-02-0	Yes	
		Hexazinone	51235-04-2	Yes	
		Saflufenacil	372137-35-4	Yes	
		6:2 FTSA	6:2 Fluorotelomer sulfonic acid	27619-97-2	Yes
		PFBS	Perfluorobutanesulfonic acid	375-73-5	Yes
		PFDA	Perfluorodecanoic acid	335-76-2	Yes
		PFD <sub>o</sub> A	Perfluorododecanoic acid	307-55-1	Yes
		PFHpA	Perfluoroheptanoic acid	375-85-9	Yes
		PFHxS	Perfluorohexanesulfonic acid	355-46-4	Yes
		PFHxA	Perfluorohexanoic acid	307-24-4	Yes
		PFNA	Perfluorononanoic acid	375-95-1	Yes
		PFTriA	Perfluorotridecanoic acid	72629-94-8	Yes
		PFUnA	Perfluoroundecanoic acid	2058-94-8	Yes
		8:2 FTSA	8:2 Fluorotelomer sulfonic acid	39108-34-4	Yes
		PFBA	Perfluorobutanoic acid	375-22-4	Yes
		PFDS	Perfluorodecane sulfonic acid	335-77-3	Yes
		PFHpS	Perfluoroheptanesulfonic acid	375-92-8	No
		FOSA	Perfluorooctane sulfonamide	754-91-6	Yes
		PFPeS	Perfluoropentanesulfonic acid	2706-91-4	No
	PFPeA	Perfluoropentanoic acid	2706-90-3	Yes	
	PFTeA	Perfluorotetradecanoic acid	376-06-7	Yes	
Category III (Reasonable probability of being detected in groundwater)	DONA	4,8-Dioxa-3H-perfluorononanoic acid	919005-14-4	Yes	
	HFPO-DA	Hexafluoropropylene oxide dimer acid (GenX)	13252-13-6	Yes	
	NEtFOSE	N-Ethyl perfluorooctane sulfonamidoethanol	1691-99-2	Yes	
	PFODA	Perfluorooctadecanoic acid	16517-11-6	Yes	
	10:2 FTSA	10:2 Fluorotelomer sulfonic acid	120226-60-0	No	
	4:2 FTSA	4:2 Fluorotelomer sulfonic acid	757124-72-4	No	
	9Cl-PF3ONS	9-chlorohexadecafluoro-3-oxanonane-1-sulfonic acid (F-53B Major)	756426-58-1	No	
	11Cl-PF3OUdS	11-chloroeicosafluoro-3-oxaundecane-1-sulfonic acid (F-53B Minor)	763051-92-9	No	
	NEtFOSA	N-Ethyl Perfluorooctane sulfonamide	4151-50-2	No	
	NEtFOSAA	N-Ethyl perfluorooctane sulfonamidoacetic acid	2991-50-6	No	
	NMeFOSA	N-Methyl perfluorooctane sulfonamide	31506-32-8	No	
	NMeFOSAA	N-Methyl perfluorooctane sulfonamidoacetic acid	2355-31-9	No	
	NMeFOSE	N-Methyl perfluorooctane sulfonamidoethanol	24448-09-7	No	
PFDoS	Perfluorododecanesulfonic acid	79780-39-5	No		
PFHxDA	Perfluorohexadecanoic acid	67905-19-5	No		

	PFNS	Perfluorononanesulfonic acid	68259-12-1	No
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**Bold** indicates that the Additional Review Needed column was updated.