



Kevin L. Shafer, P.E.
Executive Director

October 10, 2019

Jason Knutson, P.E.
Wisconsin Department of Natural Resources
P.O. Box 7921
Madison, WI 53707

Re: PFAS Request for Municipal Wastewater Treatment Facilities with Industrial Pretreatment Programs

Dear Mr. Knutson:

This letter responds to your letter of July 22, 2019, that provided municipalities with background on the statewide initiative to identify and quantify sources of perfluoroalkyl and polyfluoroalkyl substances (PFAS) and requested that our POTW take voluntary actions, including monitoring and source identification.

As you are aware, MMSD staff have followed this issue closely for the past few years or more. We support WDNR's desire to collect monitoring data, investigate and reduce sources of potential PFAS contamination. Our staff have attended and provided input at most of the PFAS Technical Advisory Group and Subgroup meetings, and technical input to the WDNR Laboratory Certification staff's PFAS laboratory certification plan and requirements document.

In support of this effort, we plan to take the following actions:

- We will collect influent and effluent samples at our two water reclamation facilities. Given the magnitude of our daily flows and the size of our industrial base, however, one sampling event is inadequate to give us a representative snapshot of our system. So, we plan on an initial survey that would include three sampling events at each of our facilities, spaced roughly 3-4 weeks apart.
- Given the importance of this data, we will use a WDNR certified laboratory. Knowing that the Department is making remarkable progress in getting the requirements document completed and establishing a certification for PFAS, we know that we will not need to wait too long for a certified laboratory to be available. We would rather wait until we have the added assurance of using a laboratory that is certified.

- As the primary pollutants of concern at this time are PFOS and PFOA, we will limit our initial wastewater monitoring efforts to those two compounds. While the WDNR has expressed an interest in getting data for 34 additional PFAS compounds, we will not know which of those compounds will actually be compounds of concern until more data is available from WDNR, presumably some time in 2020 or later. The benefit of collecting information must be weighed against potential public concerns over values that cannot be interpreted or related to any risk or regulatory values. Nor can they be compared to national standards or, in some cases, monitoring data collected by other states since the list is unique to our state. In response to PFAS contamination being a national and global issue, we should exercise caution in developing customized analyte lists to define the problem.
- With regards to biosolids, we are already responding to requests for testing based on regulatory requirements from other states where we distribute Milorganite® fertilizer. Our annual testing for 2019 was performed according to the requirements (including specific analyte list) for the state of Maine. We are happy to share those results with you if you would like. The method used was an isotope dilution method. For 2020, we will review the requirements we need to meet for all our customers and establish a monitoring plan based on meeting those needs. From what we know now, it appears that there will be overlap in requirements so that we can meet multiple needs in an efficient manner.

We hope that the data we collect will aid you in your process. Once we have the initial data, we agree that further examination of records and industrial facilities may be necessary to investigate and reduce sources. We fully intend to continue to participate in your process to develop useful protocols and standards.

If you have further questions or concerns, please feel free to contact me or Sharon Mertens, our Director of Water Quality Protection, smertens@mmsd.com.

Sincerely,



Kevin L. Shafer, P.E.
Executive Director
Milwaukee Metropolitan Sewerage District