



Water Quality Coalition
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TO: Secretary-Designee Andrea Palmer, Wisconsin Department of Health Services

FROM: Water Quality Coalition

DATE: July 09, 2019

SUBJECT: Comments on Recommended Groundwater Standards for PFOA and PFOS

On June 21, the Department of Health Services (DHS) recommended to the Department of Natural Resources (DNR) that the water quality standard for perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS) be set at 20 parts per trillion (ppt).¹ The proposed standard is a combined standard, meaning it applies to the sum of PFOA and PFOS.² In addition, DHS recommended a combined preventive action limit (PAL) of 2 ppt.³ On July 8, DHS published the standards as proposed guidance documents.⁴

The DHS standard would have a detrimental impact on Wisconsin's economy. It will significantly impact tax payers, utility rate payers, job creators, and local governments not only with the cost of installing expensive and underdeveloped control equipment, but also the cost of fines and forfeitures when the regulated community cannot meet a nearly impossible standard. The standard was seemingly based on limited scientific analysis, with no cost-benefit analysis.

The Coalition believes DHS should revise the recommended standard and PAL based on lack of transparency, actions inconsistent with statutory authority, and the incomplete scientific evaluation in the standard setting process.

I. THE PROCESS FOR SETTING GROUNDWATER STANDARDS PROVIDED NO TRANSPARENCY OR PUBLIC OUTREACH

This is the first time in a decade that new groundwater standards have been set. For that reason, it is important to understand the process, agency authority and responsibility, and the lack of transparency throughout the process.

a. DNR's Process Provides No Transparency Until Final Rulemaking

The process for setting standards is laid out in Wisconsin Statutes Section 160, and also described at a high level in DHS's overview which was also proposed as guidance on July 8, 2019.⁵ First, a state agency and/or DNR determine internally which substances require a health-based groundwater standard.⁶ DNR is required to collect information on a substance identified as potentially hazardous, but public

¹ § 160.05(1)

² DHS, *Perfluorooctanoic acid (PFOA) 2019 Cycle 10*; <https://www.dhs.wisconsin.gov/publications/p02434o-2.pdf>

³ *Id.*

⁴ Wisconsin Department of Health Services Notice of Proposed Guidance Documents https://docs.legis.wisconsin.gov/code/register/2019/763A2/register/guidance_documents/department_of_health_services_dhs/public_notice_notice_of_proposed_guidance_070119

⁵ <https://www.dhs.wisconsin.gov/publications/p02432.pdf>

⁶ § 160.05(1)



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outreach requirements are minimal and DNR decides when outreach is appropriate.⁷ DNR categorizes the potentially hazardous substances according to risk characteristics, and ranks the priority of the substances accordingly.⁸ Substances are considered Category 1 if they are detected at levels exceeding the federal number.⁹ Substances are ranked within the category based on the risk they pose to health, including carcinogenicity.¹⁰ There is no public outreach requirement during this process.

Then, DNR sends the list of hazardous substances to DHS, who determines the numerical standard for each substance.¹¹ There is no public outreach or opportunity for input during the standard setting process at DHS.

After the standard is set by DHS, DNR is obligated to propose rules to enforce that standard.¹² While both DHS and DNR suggest that DNR *can* propose rules, the law, in fact, *requires* DNR to propose rules to enforce the standard recommended by DHS.¹³ The agencies also note that rulemaking allows for public input, but that input is solely for the process of enforcing the standard, not determining the standard. The public may ask questions regarding the numerical standard, but the standard, as set by DHS, may not be changed and must be enforced by DNR.¹⁴

Although the PAL is not intended to be an absolute standard at which remediation action is always required, DNR is obligated to promulgate rules to enforce a PAL of 10-20% of the standard unless DNR determines that limit is not technically or economically feasible.¹⁵ If a PAL is exceeded, DNR can force a regulated entity to take any action technically and economically feasible to control the contamination.¹⁶ DNR has discretion to determine what is considered technically and economically feasible. DNR has significant discretion on how to enforce standards and PALs.¹⁷

a. DHS's Process Provides No Transparency or Public Outreach

DHS's authority to make a recommendation to DNR is also derived from Wisconsin Statutes Section 160. Specifically, §160.07(4) spells out the process by which DHS *shall* develop recommendations.

The first step if is for DHS to determine whether a federal number exist.¹⁸ A federal number can be one of three things: 1) a drinking water standard or maximum contaminant level established by the EPA, 2) a no-adverse response level suggested by the EPA, or 3) for oncogenic substances, a concentration based on a risk level determination by the EPA or a concentration based on a probability of risk model determined by the national academy of sciences.¹⁹

⁷ § 160.17

⁸ § 160.05(3)

⁹ § 160.05(3)(a)

¹⁰ § 160.05(4)

¹¹ § 160.07

¹² § 160.07(5)

¹³ <https://dnr.wi.gov/news/releases/article/?id=4771>, <https://www.dhs.wisconsin.gov/water/gws.htm>;

¹⁴ § 160.11

¹⁵ § 160.001(8); § 160.15

¹⁶ NR 140.02(3)

¹⁷ NR 140.02

¹⁸ §160.04(a).

¹⁹ §160.01(3)(a)-(c)



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If a federal number exists, that number *shall* be the enforcement standard unless there is “significant technical information which is scientifically valid, and which was not considered when the federal number was established, upon which the department of health concludes, utilizing the methodology under §160.13 and with a reasonable scientific certainty, that such a standard is justified.”²⁰

Should DHS stray from the federal number in setting a different limit, the agency must follow §160.13 by first determining the acceptable daily intake for the substance.²¹ Much like the standard, if EPA has determined a daily intake level for the substance, DHS shall accept that limit.²² If one does not exist, DHS may determine its own. In doing so, DHS divides the no-observable-effect level by a “suitable uncertainty factor” as determined by the agency.²³ DHS has discretion to determine an acceptable risk level based on the enumerated considerations.²⁴

DHS must also determine whether the substance is an oncogen, which impacts both the PAL and the acceptable risk level.²⁵ If DHS determines the EPA’s standard presents an unacceptable probability of risk, it provides that opinion and an evaluation of the oncogen potential to DNR, along with the recommended standard.²⁶ If DHS determines the substance is oncogenic, the prescribed risk is the expectation that no more than one excess death will occur in a population of 1,000,000 for 70 years, based on a 10-kilogram person drinking a liter of untreated water per day.²⁷ In addition, if the substance is considered an oncogen, the PAL is 10%, rather than 20%, of the enforcement standard. “Oncogen” is not defined in statute.

b. There Should be More Transparency and Collaboration by Agencies

In the most recent round of standards, there were multiple agency actions and decision points made with no public input or transparency, including the determination that substances were hazardous, the categorization of the substances, whether a federal number exists for each substance, which scientific studies should be evaluated, whether there exists an established daily intake level, the acceptable risk level for non-oncogens, the uncertainty factor for determining a daily intake level, whether the substances are oncogenic, and recommended PALs.

On July 8, DHS published support documents for the PFOA and PFOS standards (as well as multiple other groundwater standards) as guidance on the agency website.²⁸ With approval of Governor Evers, DHS shortened the comment period on all of these documents from the statutory 21-day period to one, single day.²⁹ While the intent of DHS is unclear, it is very clear that limiting the comment period on multiple complex standard to one day is not a reasonable opportunity for stakeholder or public input. While a comment period may give the appearance of public outreach, the agency’s actions are the opposite of transparent and the one-day comment period shows the agency’s complete disregard for administrative process.

²⁰ §160.07(4)(a),(e)

²¹ § 160.13(2)(a)

²² § 160.13(2)(b)1

²³ § 160.13(2)(b)3

²⁴ *Id.*

²⁵ § 160.13(2)(b)4

²⁶ *Id.*

²⁷ § 160.13(2)(b)4; 160.13(2)(c)

²⁸ Wisconsin Department of Health Services Notice of Proposed Guidance Documents, July 8, 2019

²⁹ § 221.112(1)



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The first meaningful opportunity for public input will be when rulemaking at DNR begins. During the rulemaking, the public may submit questions on how the standard were developed by DHS, but DNR has no authority to change the standard based on public input.³⁰

The Legislature has shown a clear preference for transparency, public outreach, and stakeholder input during regulation development.³¹ Incorporating more public input transparency in the process would help avoid the legal and technical concerns highlighted below.

II. DHS'S STANDARD IS INCONSISTENT WITH STATUTORY REQUIREMENTS

The Coalition is concerned with the legal validity of the current standards. We believe that the agencies disregarded clear statutory language when setting the PFOA and PFOS standards. We also believe the agencies did not fulfill their statutory obligations during the process.

a. DHS's Recommendation Should Not Be More Restrictive than the Federal Number.

As noted above, DHS must adopt the Federal Number if one exists unless there is “significant technical information which is scientifically valid and which was not considered when the federal number was established, upon which the department of health concludes... with a reasonable scientific certainty...” that a more restrictive standard is justified.³² The definition of Federal Number includes a drinking water standard or maximum contaminant level established by the EPA.³³ Neither “drinking water standard” nor “maximum containment level” is defined in statute.

i. EPA's 2019 Proposal is a Federal Number under § 160.01(3) and Must be Adopted by DHS

On April 25, 2019, EPA proposed a recommendation for screening and remediation levels for PFOA and PFOS in groundwater.³⁴ Because neither “drinking water standard” nor “maximum containment level” is defined in statute, the ordinary meaning of the phrases must be applied to determine if EPA's proposal meets the definition.

EPA describes this proposal as “cleanup levels for PFOA and/or PFOS contamination of groundwater that is a current or potential source of drinking water.”³⁵ Because EPA linked the levels to drinking water, it is a standard set for the purpose of limiting the substance in drinking water. Moreover, the remediation level of 70 ppt is a maximum level for a contaminant as set by EPA. That it is not presented as a “maximum containment level” or “MCL” as defined by EPA is irrelevant so long as it meets the plain meaning of the

³⁰ § 160.11

³¹ See generally 2011 Act 21, 2017 Act 57, 2017 Act 369.

³² §160.07(4)(a),(e)

³³ §160.01(3)(a)-(c).

³⁴ See generally <https://www.epa.gov/pfas/draft-interim-recommendations-addressing-groundwater-contaminated-pfoa-and-pfos>

³⁵ USEPA Draft Interim Recommendation to Address Groundwater Contaminated with Perfluorooctanoic Acid and Perfluorooctane Sulfonate, https://www.epa.gov/sites/production/files/2019-04/documents/draft_interim_recommendations_for_addressing_groundwater_contaminated_with_pfoa_and_pfos_public_comment_draft_4-24-19.508post.pdf



phrase by setting some maximum threshold for a particular contaminant. Therefore, EPA's proposal is a Federal Number under the plain language of §160.01(3)(a).

Per §160.07((4)(e), DHS can only set standards more restrictive than the Federal Number if it relies on information that was not available for consideration at the time EPA set the standard. DHS, however, relied on the same documents used by EPA, as well as one other ATSDR Toxicological Profile (Profile), which was published in draft form in June of 2018, nearly a year before EPA's most recent Federal Number. Although the Profile is not final and should not be relied upon, it is safe to assume that EPA evaluated all available scientific data available when determining the Federal Number, including the current and previous iterations of the ATSDR draft toxicological profiles. Therefore, unless DHS can identify additional "significant technical information" that has been developed since the most recently proposed Federal Number in April of 2019, DHS may not recommend more restrictive standards than 70 ppt.

i. Even if a Federal Standard Did Not Exist, DHS Has Not Fully Evaluated the Available Scientifically Valid Technical Information

Even if the agencies disagree that the most recent EPA proposal is a Federal Number, there is no doubt the 2016 EPA drinking water health advisory for PFOA and PFOS of 70 ppt is a Federal Number. A Health Advisory is a number that incorporates a "margin of protection for all Americans throughout their life from adverse health effects resulting from exposure to PFOA and PFOS in drinking water." In other words, it is a no-adverse response level, and fits the definition of Federal Number. DNR conceded this fact when it categorized PFOA and PFOS as Category I. A substance can only be ranked as Category I if a Federal Number exists and is being exceeded.

Accordingly, if DHS accepts the 2016 standard as the Federal Number, but does not adopt it, the agency should not choose just one study to evaluate, but should consider all available scientifically valid technical information developed since 2016 when establishing a different Wisconsin Standard.³⁶ In the last three years, multiple studies have been completed on the health impacts of PFOA and PFOS by a variety of entities, including other federal agencies.³⁷ However, the only report or study referenced by DHS in the one-page summary provided with the recommendation is the draft Profile.

The statutes set a high burden for DHS to develop a standard other than the Federal Number, and that burden has not been met here by the evaluation of one additional draft report to set a standard that is significantly lower than the Federal Number.

b. DHS Must Set a Standard for Each Individual Substance

DHS has recommended a combined standard of 20 ppt for PFOA and PFOS. However, Wisconsin law does not allow for the agency to group substances together for a combined standard. When DNR referred the two substances to DHS, DNR listed and ranked PFOA and PFOS independent of each other.³⁸ Clearly, DNR was requesting a standard be set for each individual substance. In addition, Chapter 160

³⁶ § 160.07(4)(e)

³⁷ <https://www.fda.gov/food/chemicals/and-polyfluoroalkyl-substances-pfas>;
<https://www.canada.ca/en/services/health/publications/healthy-living/water-talk-drinking-water-screening-values-perfluoroalkylated-substances.html>

³⁸ DNR Letter to Karen McKeown, Request for Recommendations for State Groundwater Quality Standards, March 2, 2018



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speaks to the treatment of each ‘substance’ for which a standard is being set, but in no way contemplates combining substances to set a cumulative standard.

It makes sense that the legislature would force DHS to evaluate, and DNR to regulate, substances on an individual basis. This forces the agencies to evaluate the health impacts of each substance on its own. In other words, DHS must evaluate the health impacts of PFOA independent of the health impacts of PFOS to determine to which substance any negative impact is attributed. Then DHS must set an enforcement standard for each individual substance based on that evaluation.

Allowing the agencies to group substances together in this manner could result in costly, burdensome, and unnecessary overregulation. For example, if DHS were to determine that one substance has significant health impacts and a second substance has minimal health impacts, but recommended a combined standard for the two substances, an entity dealing with only the second substance will be required to remediate to the same level, even though the health benefit of doing so is significantly lower.

This problem could be greatly exacerbated based on DNR’s recent request for water quality standards for 34 more PFAS compounds.³⁹ Should DHS choose to combine the standards without fully analyzing the health impacts of each substance on its own, the regulated community could be faced with expensive control equipment to control substances that have little or no health impact. Moreover, permit holders could be forced to reduce or eliminate substances never possessed or controlled by that particular facility.

The fact that two substances contain a common elemental bond does not supersede the statutory obligation to evaluate the health impacts of each substance and set a standard for each substance.

c. DHS’s Standards Should be Promulgated as a Rule

The Wisconsin Water Quality Coalition is also concerned that DHS proposes to adopt the recommended standards as guidance. The standard recommended by DHS meets the definition of a rule and should be promulgated as such.

Wisconsin Stat. § 227.(1)(13) defines a rule as a “regulation, standard, statement of policy, or general order of general application that has the force of law and that is issued by an agency to implement, interpret, or make specific legislation enforced or administered by the agency or to govern the organization or procedure of the agency.” While the resulting standard produced by DHS is labeled statutorily as a recommendation, as noted above, there is no opportunity to revise this standard once DNR begins rulemaking. DNR is required to adopt this standard, or a more restrictive percentage of the standard. Thus, the “recommended” standard is indeed an enforcement standard, squarely meeting the definition of “rule.”

Further, there is no exception in place for this recommended standard. Wis. Stat. 227.01(13)(zb) provides an exception under this process for the establishment of a list of substances, but not for the resulting recommended standard.

d. DNR Cannot Regulate Entities for Substances Never Possessed or Controlled

Section 292.13(1) exempts facilities from liability for groundwater contamination if the discharge did not originate at, and was not possessed or controlled by, the facility. If a facility can provide information

³⁹ DNR letter to Jeanne Ayers, Request for State Groundwater Quality Standard Recommendations under ch. 160, Stats., April 10, 2019.



illustrating that does not possess, control, or emit PFOA or PFOS, then presumably that facility is not liable for removing those substances from groundwater.

While the burden is on the facility to show it did not possess or control the substances, facilities may be able to show this with historical records. This section, like others relating to groundwater contamination, addresses one single substance at a time, meaning PFOA and PFOS must be treated independently for exemptions.⁴⁰

DNR must give entities the opportunity to investigate and submit information that shows the entity did not cause either PFOA or PFOS to be discharged. This is particularly important when addressing a substance that moves freely through water and may be present at levels exceeding the proposed PAL in a large portion of the state's groundwater. Forcing permittees, either municipal or industrial, to remove existing contaminants from groundwater for which they are not responsible is unfair and inequitable.

III. THE STANDARD WAS NOT SUPPORTED WITH TECHNICAL INFORMATION

In addition to the legal concerns laid out above, the Coalition has several concerns with the technical and scientific aspects of the standard setting process by DHS. It is possible that DHS did not review *all* relevant scientific information because of limited resources. According to testimony at a recent hearing on Assembly Bill 85 related to PFOA and PFOS regulation, DHS relies on one single groundwater toxicologist to determine the groundwater standards for all substances. The toxicologist explained the process by which standards are developed, including a full evaluation of all available science and development of a support document prior to the standards being sent back to DNR.⁴¹ However, DHS representatives also testified that the significant lag between when DNR sent the request in March of 2018 and the DHS's recommendation in on July 9, 2019 was due to the agency's reliance on one toxicologist for the entirety of the review. Therefore, it is likely DHS did not complete a full review of the available Science, and relied only on a few, limited reports and studies to determine the standard.

a. DHS Provided No Information to Support its Recommended Standard

The DHS toxicologist testified that she reviews "all of the relevant health information to ensure that [the] recommended standard is scientifically sound and adequately protective."⁴² She explained that DHS had reviewed more than 5,000 scientific publications for the twenty-seven compounds that were evaluated.⁴³

Support for DHS's recommendation is linked on the agency's website and consist only of a two-page document for each of the substances.⁴⁴ Those documents each cite EPA's Support document for the recently proposed guideline of 70 ppt and one additional document, a draft Agency for Toxic Substances and Disease Registry (ATSDR) Toxicological Profile for Perfluoroalkyls.⁴⁵ No other studies or reports are listed as references for the standards.

⁴⁰ § 292.13(1)

⁴¹ Testimony found at

https://docs.legis.wisconsin.gov/misc/lc/hearing_testimony_and_materials/2019/ab85/ab0085_2019_04_09.pdf

⁴² *Id.*

⁴³ *Id.*

⁴⁴ <https://www.dhs.wisconsin.gov/publications/p02434o-2.pdf>;

<https://www.dhs.wisconsin.gov/publications/p02434o-1.pdf>

⁴⁵ *Id.* The ATSDR toxicological profile is not an independent primary study, but rather an extensive literature review.



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i. The EPA Support Documents Do Not Support a 20 ppt Standard

The listed references do not logically support the standard of 20 ppt. The EPA references were relied on by EPA to propose a remediation level of 70 ppt. They do not support a more restrictive standard. In fact, multiple stakeholders comments on EPA's proposal noting that the 70 ppt standard is too restrictive based on the available science.⁴⁶ EPA will be review the comments and recommendations before the proposal is finalized

ii. The ATSDR Profile Does Not Support a 20 ppt Standard

The Profile also does not support a 20 ppt combined standard. MRLs are defined as the daily human exposure to a hazardous substance, expressed as a dosage, that is likely to be without appreciable risk of adverse noncancer health effects.⁴⁷ MRLs do not evaluate cancer risk, and are intended to be screening levels at hazardous waste sites.⁴⁸ In a risk assessment, screening levels are used as a first step to determine whether or not there is a health hazard worth investigating furthered; they do not define a health risk and exposure in excess of a screening level does not indicate that any exposed person's health is at risk. ATSDR explicitly states "serious health effects...are not used as a basis for establishing MRLs," "**MRLs are not intended to define clean-up or action levels,**" and "exposure above the MRL does not mean that adverse health effects will occur."⁴⁹ In other words, ATSDR uses a very conservative approach, including an uncertainty factor of up to 300, for the MRLs.⁵⁰

In fact, the Profile explains the limitations of epidemiological studies on evaluating the impacts of PFOA and PFOS on on human health as follows:

Although a large number of epidemiology studies have examined the potential of perfluoroalkyl compounds to induce adverse health effects, most of the studies were cross-sectional in design and do not establish causality. Epidemiology studies have found statistically significant associations between serum perfluoroalkyl levels and several health effects, although the results were not consistent across studies. Many of the studies reported dose-related trends, but these trends were not as apparent when comparing across studies; some effects were observed in populations with background PFOA levels but not in populations with high serum PFOA levels. ... It should be noted that although the data may provide strong evidence for an association, it does not imply that the observed effect is biologically relevant because the magnitude of the change is within the normal limits or not indicative of an adverse health outcome. Plausibility depends primarily on experimental toxicology studies that establish a biological mechanism for the observed effects.⁵¹

The MRL represents an intentionally overly-conservative screening level at hazardous waste sites that is used to determine if further evaluation is necessary. It is not a water quality standard or enforcement limit

⁴⁶ See generally docket EPA-HQ-OLEM-2019-0229 at <https://www.regulations.gov/>

⁴⁷ <https://www.atsdr.cdc.gov/toxprofiles/tp200.pdf> (713/852)

⁴⁸ *Id.*

⁴⁹ *Id.*, emphasis added

⁵⁰ *Id.*

⁵¹ 715/852 - <https://www.atsdr.cdc.gov/toxprofiles/tp200.pdf>



of any kind. Moreover, much like EPA's 70 ppt proposal, this Profile is currently in draft form and numerous public comments from the scientific community criticizing various aspects of the MRL derivation for these compounds have not been address in the current draft.

In fact, Wisconsin's water quality standards have historically been much higher than MRL levels. For example, the MRL for Fluoride is 0.05 mg/kg/day, or 0.5 mg/L for a 10kg person drinking one liter of water per day,⁵² but the Wisconsin enforcement standard is 4mg/L.⁵³ The MRL for Arsenic is 3 µg/L for a 10kg person,⁵⁴ but the Wisconsin enforcement standard is 10 µg/L.⁵⁵

Even if DHS adopted this overly-conservative approach, the MRL screening levels were determined by ATSDR to be 0.000002 mg/kg/day for PFOS and 0.000003 mg/kg/day for PFOA⁵⁶ which translates into 0.00002 mg/L and 0.00003 mg/L, respectively, for a 10 kg person. A 10 kg person could drink one liter of untreated water at a concentration of 20 ppt of PFOS *and* 30 ppt of PFOA and would still not exceed the MRLs for the two substances. Although the Profile explains some uncertainty is due to co-exposure to the two substances, that was addressed with the high uncertainty factor, and is already incorporated into the MRL. There is no recommended combined MRL for the substances.

b. There is No Support for a 10% Preventive Action Limit

DHS recommends a PAL of 2 ppt, or 10% of the enforcement standard. It is unclear from the statutes whether DHS or DNR is responsible for setting a PAL.⁵⁷ In any event, the PAL shall be 20% unless the substance has carcinogenic, mutagenic, or teratogenic properties or interactive effects, or if the department concludes, based on sound science, that a more stringent level is necessary.⁵⁸ As noted above, unless DNR determines that compliance with a PAL is not economically or technically feasible, it must promulgate rules to prevent PAL exceedances.⁵⁹ In other words, the PAL becomes the enforceable regulatory limit.

DHS asserts that PFOA and PFOS may have carcinogenic potential and have been shown to be genotoxic in some tests.⁶⁰ DHS also makes general statements about potential interactive effects.⁶¹ However, DHS does not address the conclusion of EPA, based on those same studies, that the limits set to address noncancer effects are already lower than the concentration associated with a one-in-a-million cancer risk.⁶² In other words, EPA concluded that limits do not need to be lowered any further to address cancer risk. DHS did not cite specific support for asserting the compounds are teratogenic or interactive. There is simply no support provided by DHS for a 10% PAL.

⁵² Wisconsin law requires DHS to calculate enforcement standards based on a 10 kg person drinking one liter of water per day, *see* § 160.13(2)(C)

⁵³ <https://www.atsdr.cdc.gov/toxprofiles/tp11-a.pdf> 3/28; NR 140.10

⁵⁴ <https://www.atsdr.cdc.gov/toxprofiles/tp2.pdf>

⁵⁵ NR 140.10

⁵⁶ <https://www.atsdr.cdc.gov/toxprofiles/tp200-a.pdf>

⁵⁷ § 160.15 uses "the department" which is defined in the chapter as DNR (unless the context requires otherwise), but defined in the preceding section (160.13) as DHS.

⁵⁸ § 160.15(1)-(2)

⁵⁹ § 160.15; NR 140.04(3)

⁶⁰ DHS, *Perfluorooctanoic acid (PFOA) 2019 Cycle 10*

⁶¹ *Id.*

⁶² USEPA Draft Interim Recommendation for PFOA and PFOS



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IV. CONCLUSION

In light of the concerns raised above, the Coalition respectfully requests that DHS reconsider the recommendation for PFOA and PFOS groundwater standards. We believe that the enforcement standard requires revision, and would welcome the opportunity to provide scientifically valid technical information and experts to assist in that process.