

PFAS Talking Points

Wisconsin Rural Water Association*

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Background/ Public Information Issues

1. As public entities responsible for the delivery of safe drinking water and the collection and treatment of wastewater, we acknowledge that PFAS at certain concentrations can pose a risk to public health and the environment, which we take seriously. Areas of concentrated known releases should be addressed like other hazardous substance spills. However, it is important to develop a regulatory approach that does not create more public health and welfare problems than it solves.
2. PFAS compounds are pervasive in our society. They are found in our blood, household dust, clothing, cosmetics, and many other products that we use on a daily basis.
3. PFAS compounds are difficult to sample and analyze in certain material such as wastewater and biosolids. There is no approved test method currently available.
4. Wastewater treatment plants and water utilities are not sources of PFAS. Water utilities do not add PFAS to drinking water and wastewater facilities do not add PFAS to waste streams. Removing all PFAS through treatment processes is not technically feasible.

State Agency Regulatory Issues

5. The DHS recommended groundwater standard of 20 ppt and the preventive action limit of 2 ppt are significantly more stringent than EPA's health advisory of 70 ppt.
6. The DHS recommended standard needs further review. Wis. Stat. ch. 160 generally requires Wisconsin use federal numbers which are still in development; and the relationship between PFAS in material like biosolids, and adverse health effects, is not well documented.
7. A groundwater standard is not transferrable to surface water standards or land application standards. Testing of surface water and land prior to the generation of material specific standards will result in misleading information.
8. Applying a standard of or approaching 2 ppt to biosolids would preclude many, if not all, treatment plants from land applying biosolids.

Regulatory Process

9. Development of PFAS standards and regulations must include input from all stakeholders to ensure these standards and regulations are developed to benefit the public. PFAS standards should be based on consistent, science-based approaches.
10. PFAS is a national issue, not a state issue. PFAS standards should come from the federal government and requirements to regulate the manufacture and use of PFAS should be nationwide.

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