

Date: March 23, 2023
To: Joe Trueblood, Utility Superintendent
From: Bill Swearingen, Operations Supervisor
Subject: PFAS Monitoring Updates

Currently, the utility is participating in Wisconsin Department of Natural Resources PFAS testing, specifically PFOA and PFOS contaminants, which are a subset of PFAS compounds. As you are aware, PFAS (polyfluoroalkyl substances) are manmade synthetic chemical compounds and exist in industrial and consumer products. These chemicals do not readily breakdown in the environment. Historically, test results in Lake Michigan and drinking water have been found to be at very low levels and well below health advisory standards. WDNR current Maximum Contaminant Level for PFOA and PFOS is 0.000070 mg/L (70 parts per trillion). This level is set for the combined concentration of PFOA and PFOS.

The utility has tested for 18 PFAS contaminants and 16 were not detectable:

- Perfluorooctanoic acid (PFOA) *
- Perfluorooctanesulfonic acid (PFOS) *
- Perfluorobutanesulfonic acid (PFBS)
- Perfluoroheptanoic acid (PFHpA)
- Perfluorohexanesulfonic acid (PFHxS)
- Perfluorononanoic acid (PFNA)
- Perfluorodecanoic acid (PFDA)
- Perfluorohexanoic acid (PFHxA)
- Perfluorododecanoic acid (PFDoA)
- Perfluorotridecanoic acid (PFTrDA)
- Perfluoroundecanoic acid (PFUnA)
- N-ethyl Perfluorooctanesulfonamidoacetic acid
- N-methyl Perfluorooctanesulfonamidoacetic acid
- HFPO-DA/GenX
- ADONA
- 9Cl-PF3ONS/F-53B Major
- 11Cl-PF3OUdS/F-53B Minor
- Perfluorotetradecanoic acid (PFTeDA)

* Our 2023 first quarter test results for PFOA and PFOS are detectable at 1.9 part per trillion.

Recently, the US EPA released a draft Maximum Contaminant Level (MCL) standard of 4.0 parts per trillion for both PFOA and PFOS. The proposed regulation is under public review with the US EPA, before developing into a final regulation.

Following mandatory WDNR PFAS quarterly monitoring, the utility will also participate in US EPA Unregulated Contaminant Monitoring Rule (UCMR) testing. The Utility has participated in UCMR testing since early 2000s. The UCMR system generates a new list of contaminants identified for monitoring and the monitoring program is administered by the Environmental Protection Agency via Wisconsin Department of Natural Resources. This testing will begin in October 2024. The utility will collect samples and testing for 29 PFAS compounds and one metal compound (lithium).