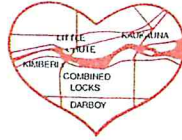


**DISTRICT DIRECTOR:**

Brian M. Helminger

**SERVING:**

Combined Locks  
Kaukauna  
Kimberly  
Little Chute  
Darboy S.D.



**COMMISSIONERS:**

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**Heart of the Valley  
METROPOLITAN SEWERAGE DISTRICT**

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August 26, 2019

State of Wisconsin-Dept. of Natural Resources  
Attn: Jason Knutson & Wade Strickland  
101 S. Webster Street  
Madison, WI 53707-7921

**Re: PFAS Monitoring letter dated July 22, 2019**

HOVMSD acknowledges your letter requesting POTW's test for PFAS in influent and effluent samples. This issue was discussed at the August Heart of the Valley MSD Commission meeting and HOVMSD has the following concerns related to testing for PFAs compounds as described below.

As your letter dated July 22, 2019 recognizes, currently there are no EPA-approved methods for both PFAS sampling or its analysis in the matrix of wastewater. Absent standardized sampling methods and testing protocol, any results obtained from wastewater analysis will not result in reliable and defensible science-based data.

At this time, there is a 20 ppt standard that is applicable to groundwaters but no standard has been promulgated or is in place for surface water. Sampling and analysis for a compound in which there is no standard results in the generation of data which is baseless and not meaningful.

Municipal POTWs do not produce or add PFAS to the liquid streams that we treat to NPDES permit standards, and further are believed to have little capability to treat or optimize to remove PFAS. In the event that testing results show that PFAS may be present in wastewater influent and effluent, HOVMSD has no means or mechanisms in place for its treatment and/or removal.

HOVMSD will continue to monitor the progress made in regard to PFAS/PFOA compounds as an emerging contaminant of concern. Due to the concerns discussed above, HOVMSD respectfully declines the Department's request for influent/effluent testing at this time. HOVMSD will most certainly revisit this issue as any changes related to concerns discussed above are addressed and resolved.

Sincerely,

Brian Helminger  
District Director, HOVMSD