

Dawn Bartel

From: Kevin Skogman <kevin.skogman@hvmsd.org>
Sent: Thursday, January 21, 2021 7:28 AM
To: Dawn Bartel
Subject: FW: WDNR On-Site Effluent Sampling Notification - Heart of The Valley Metro Sewerage District
Attachments: PFAS POTW Sampling FAQ Final 11.25.20 (005).pdf

From: Stanek, Mark F - DNR [mailto:Mark.Stanek@wisconsin.gov]
Sent: Wednesday, January 20, 2021 3:18 PM
To: brian.helminger@hvmsd.org; chad.giackino@hvmsd.org; kevin.skogman@hvmsd.org
Cc: Oumarou, Barti - DNR; Garbe, Amy M - DNR; Schmitt Marquez, Heidi S - DNR
Subject: WDNR On-Site Effluent Sampling Notification - Heart of The Valley Metro Sewerage District

Good Afternoon,

DNR is undertaking rulemaking (WY-23-19) to develop surface water quality criteria for PFOS and PFOA. Collection of effluent data from a diverse sampling of dischargers will allow the department to (1) accurately project economic impacts of PFAS water quality standards, and (2) work with stakeholders and the public to create an implementation plan for upcoming PFAS standards that is practicable while protective of the environment. Additional background information is attached.

1. Sampling Procedure

DNR has selected your facility as one of a diverse range of facilities from which DNR will collect samples pursuant to its regulatory authority under Wis. Stat. § 283.55(2)(a) and Wis. Admin. Code § NR 208.07(1)(d). DNR will conduct the sampling and be responsible for the associated costs. I am emailing to schedule a time in which I will be able to access your site to take an effluent sample for WDNR sampling purposes. I would be coming to take a sample the morning (8 a.m.) of Tuesday, February 2nd.

I will be taking a composite sample of your effluent and sending the sample bottles to the Wisconsin State Lab of Hygiene (WSLH) for testing 36 PFAS compounds. I will be taking sample volume from your composite sampler and will need 500 mL. Please program your sampler appropriately so this volume will be available. In preparation of sampling, please do not rinse out your carboy from the day before. You will be able to split the sample if you so choose and send it to a lab of your choice. Note that in that case, all costs associated with split sampling (i.e. bottles, shipping, and testing) will be your responsibility. We will be sharing our results with your facility once they have been received. We are expecting all results to be received back from the WSLH in the Spring of 2021.

Please let me know as soon as possible if the proposed sampling date and time does not work in which case, we can attempt to reschedule as the DNR sampling schedule allows; otherwise, I will see you at 8 a.m. on Tuesday, February 2nd.

2. Use of Results

DNR understands that POTWs are not original sources of PFAS but, rather, may be receiving PFAS from users connected to the collection system. Further, due to the prevalence of these compounds in everyday life, DNR anticipates that sampling results will show at least small amounts of PFAS compounds in nearly all POTW effluent.

In some cases, however, industrial dischargers may be discharging significant concentrations of PFAS to a POTW. In such a case, source reduction can be implemented to reduce the PFAS concentrations present in effluent and potentially avoid the need for an effluent limitation if numeric criteria are eventually implemented for PFOS and PFOA.

The Department continues to be committed to collaboratively assisting municipalities with addressing any sources of PFAS identified through this sampling effort. DNR appreciates your participation in this sampling effort. If you are interested in being engaged on the development of these water quality standards, we invite you to join one of our listening sessions. Information on the standards

development process and upcoming listening sessions can be found here:
<https://dnr.wisconsin.gov/topic/SurfaceWater/NR105.html>.

If you have any initial questions, please let me know.

Thank you,

Mark Stanek

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PFAS Sampling Frequently Asked Questions (FAQs)

1. What authority does WDNR have to sample my effluent?

Both s. 283.55(2)(a), Wis. Stats, and s. NR 205.07(1)(d), Wis. Adm. Code allows authorized representatives of the department to enter the permittee's premises to access records, perform inspection of facility and equipment, and to take samples of permitted discharges.

Additionally, s. 283.55(1)(e), Wis. Stats, requires that permittees "provide such other information as the department finds is necessary to identify the type and quantity of any pollutants discharged from the point source."

2. Why is WDNR sampling for PFAS?

The water quality program is undertaking rule making (WY-23-19) to develop surface water quality criteria and analytical methods for poly- and perfluoroalkyl substances (PFAS), primarily PFOS and PFOA. The DNR must assess the economic effect of the proposed rule.

The program will sample a range of POTWs and industries that discharge at a range of effluent flow rates and accept wastewater from different types and numbers of industrial users. Sample collection of existing sources will provide the most robust data set of current state-wide PFAS concentrations and compounds in WWTP effluent.

The reason for sampling your facility's effluent and other discharges across the state is to gather facility effluent data from diverse facilities in order to project economic impacts of the PFAS surface water standard rule creation expected for 2021. This data will also allow the department to work with stakeholders to create practicable plans for implementation of these upcoming standards. If you are interested in being engaged on the development of these water quality standards, we invite you to join one of our listening sessions. Information on the standards development process and upcoming listening sessions can be found here:

In addition, as the program moves forward with standards for this pollutant, it is critical that the sources of these pollutants are understood so practical source identification and reduction efforts can be pursued.

3. Will this sampling cost me money?

No, all sampling costs associated with the samples being taken by WDNR staff are being handled by the WDNR. However, if a facility chooses to split a sample with the WDNR, all costs associated with that sample (bottle, shipping, and testing) will be the responsibility of the facility.

4. If I choose to split a sample, where can I send it for testing?

Currently, there are no labs that are certified by the State of Wisconsin for PFAS testing in non-potable water. However, there are several that have applied for certification and can be used for your sample.

The list of labs can be found on the following website:
<https://dnr.wisconsin.gov/topic/Contaminants/Labs.html>. The WDNR will be sending their samples to the WSLH for testing.

5. How does the WDNR intend to use these results?

The department understands that POTWs are not “sources” of PFAS but rather are likely receiving PFAS from users connected to the collection system. Further, we do expect to find at least small amounts of PFAS in nearly all POTW effluent due to the prevalence of these compounds in everyday life. However, it has been shown from experience in other states that some industries may be discharging significant concentrations to the POTW. In this case, it is critical that facilities are aware of where these discharges are originating to most economically and effectively address those sources. As demonstrated by Michigan’s results, it can lead to PFAS source reduction in the short-term and potential avoidance of effluent limitations and result in cost savings in the long-term.

The department continues to be committed to collaboratively assisting municipalities with addressing any identified PFAS sources, but this can only occur after sources have been identified, which is the first step in this process. If results from a facility show concerning levels, the department will work with the facility and other groups to help survey industrial users and develop an action plan that will address that discharge.

The process would likely be compromised of a step-wise approach at identifying and then addressing the discharges that are the sources, likely through process changes, source reduction measures or product replacement.

There are multiple benefits with the approach. First, understanding the sources gives facilities the opportunity to quantify and reduce those discharges prior to promulgation of surface water quality standards, which would potentially help facilities avoid effluent limitations and compliance schedules in future WPDES permits. Second, the more influent and effluent PFAS data that the department can gather translates to a more robust economic impact analysis relating to standards development. Currently, there are no numeric standards and therefore limitations will not be included in permits until further rule development activities are completed.

6. Will this data be used to give me limits?

Once a surface water standard has been codified, prior to any limits going into a WPDES permit, additional data would need to be gathered to determine the reasonable potential of an effluent exceeding a calculated water quality-based limit. It is intended that additional discharge data would be required during the permit application/reissuance process pursuant s. NR 200.065(1)(g), Wis. Adm. Code.

7. Will effluent sampling affect land application of biosolids?

The department has also received questions regarding the impact that this initiative will have on the land application of biosolids statewide. Currently, there is limited scientific information available on how PFAS in biosolids may transfers to exposure routes via pathways such as crop uptake, soil contact, and

migration to drinking water sources. The department is currently evaluating other states' and organizations' PFAS biosolids efforts to inform a Wisconsin PFAS biosolids handling and management disposal approach moving forward. The department continues to recognize the importance and benefits of land application of biosolids as a means of soil conditioning, reuse of fertilizer, and sustainable management of solids.

The department will prioritize messaging of the apparent differences in risks between PFAS concentrations in biosolids compared to concentrations in water. PFAS are understood to partition to solids and therefore may be present in biosolids at concentrations far higher than in treated effluent. It is important to understand that the exposure pathways for PFAS in biosolids and treated wastewater are different, which means that it is not appropriate to compare standards and health advisory levels for groundwater and surface water to concentrations of PFAS in biosolids. With that said, performing source reduction measures is expected to lower concentrations of PFAS in both the effluent and the biosolids.

8. Can I get a copy of the results?

Yes, all effluent data collected by the WDNR is considered an open record and is no way confidential. The WDNR intends to forward a copy of the lab results to the permittee once sample testing has been completed and sample results are available, which is anticipated in the Spring of 2021. Amy Garbe (amy.garbe@wisconsin.gov) will be handling the coordination of receiving lab results and forwarding them on to the appropriate parties involved.

Additionally, permittees are welcome to split a sample with the department at the time of sampling and send it to a lab of their choice.

9. What other permittees are the WDNR sampling?

The department is sampling a range of POTWs and industries that discharge at a range of effluent flow rates and accept wastewater from different types and numbers of industrial users. This includes POTWs that accept no industrial waste in order that the department can gather data on PFAS concentrations resulting from residential and commercial sources. For a complete list of permittees that the WDNR is scheduled to collect effluent samples and test for all 36 PFAs compounds, please contact Amy Garbe (amy.garbe@wisconsin.gov).

Any additional questions or concerns can be sent to:

Jason Knutson, Wastewater Section Chief
Jason.Knutson@wisconsin.gov
(608) 977-0713

Dawn Bartel

From: Kevin Skogman <kevin.skogman@hvmsd.org>
Sent: Thursday, January 21, 2021 9:29 AM
To: Dawn Bartel
Subject: FW: PFAS Sampling List

SHEBOYGAN WASTEWATER TREATMENT PLANT
OOSTBURG WASTEWATER TREATMENT PLANT
SUPERIOR SEWAGE DISPOSAL SYSTEM
POPLAR VILLAGE OF
GREATER BAYFIELD WWTP COMMISSION
MILWAUKEE METRO SEW DIST COMBINED
PLOVER WASTEWATER TREATMENT FACILITY
WAUPACA WASTEWATER TREATMENT FACILITY
WILD ROSE WASTEWATER TREATMENT FACILITY
NEENAH MENASHA SEWER COMMISSION WWTF

CEDARBURG WASTEWATER TREATMENT FACILITY
ASHLAND SEWAGE UTILITY
AMERY CITY OF
NEW RICHMOND WASTEWATER TREATMENT FACILITY
OSCEOLA VILLAGE OF
MUKWONAGO WASTEWATER TREATMENT PLANT
NORWAY TN SANITARY DISTRICT 1 WWTF
ABBOTSFORD WASTEWATER TREATMENT FACILITY
COLBY CITY WWTF
CADOTT WASTEWATER TREATMENT FACILITY

RIB MOUNTAIN METRO SEWAGE DISTRICT WWTF
WAUSAU WATER WORKS WW TREATMENT FACILITY
MANITOWOC WASTEWATER TREATMENT FACILITY
GREEN BAY METROPOLITAN SEWERAGE DISTRICT COMBINED
TWO RIVERS WASTEWATER TREATMENT FACILITY
PORT EDWARDS WASTEWATER TREATMENT FACILITY
NECEDAH WASTEWATER TREATMENT FACILITY
FOX WEST REGIONAL SEWERAGE COMMISSION
APPLETON WASTEWATER TREATMENT FACILITY

BEAVER DAM WASTEWATER TREATMENT FACILITY
MAYVILLE WASTEWATER TREATMENT FACILITY
HORICON WASTEWATER TREATMENT FACILITY
WAUPUN WASTEWATER TREATMENT FACILITY
COLUMBUS WASTEWATER TREATMENT FACILITY
CASSVILLE WASTEWATER TREATMENT FACILITY
DODGEVILLE WASTEWATER TREATMENT FACILITY
PLATTEVILLE WASTEWATER TREATMENT FACILITY

PRAIRIE DU CHIEN WASTEWATER TREATMENT FAC.
ARCADIA WASTEWATER TREATMENT FACILITY
LA CROSSE CITY

SUN PRAIRIE WASTEWATER TREATMENT FACILITY
MADISON METROPOLITAN SEWERAGE DISTRICT WWTF
RICE LAKE UTILITIES CITY OF
PRENTICE VILLAGE OF
PHILLIPS CITY OF
SOUTH MILWAUKEE WASTEWATER TREAT FACILITY
RACINE WASTEWATER UTILITY
FOND DU LAC WTRRF
OMRO WASTEWATER TREATMENT FACILITY
OSHKOSH WASTEWATER TREATMENT PLANT

JANESVILLE WASTEWATER UTILITY
BELOIT WASTEWATER TREATMENT FACILITY
STOUGHTON WASTEWATER TREATMENT FACILITY
MILTON WASTEWATER TREATMENT FACILITY
RHINELANDER CITY OF
OCONOMOWOC WASTEWATER TREATMENT PLNT
SUSSEX WASTEWATER TREATMENT FACILITY
WAUKESHA CITY
DELAFIELD HARTLAND WATER POLLUTION CONTROL
COMMISSION
EAU CLAIRE WASTEWATER TREATMENT FACILITY
MENOMONIE WASTEWATER TREATMENT FACILITY

JEFFERSON WASTEWATER TREATMENT FACILITY
WATERTOWN WASTEWATER TREATMENT FACILITY
REEDSBURG WASTEWATER TREATMENT FACILITY
PORTAGE WASTEWATER TREATMENT FACILITY
HARTFORD WATER POLLUTION CONTROL FACILITY
WEST BEND CITY
BRILLION WASTEWATER TREATMENT FACILITY
COLEMAN WASTEWATER TREATMENT FACILITY
GILLETT WASTEWATER TREATMENT FACILITY
ST NAZIANZ WASTEWATER TREATMENT FACILITY
HEART OF THE VALLEY METRO SEWERAGE DISTRICT

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

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