

PFAs Informational Briefing

Update on local PFAs pollution and clean-up efforts



Who: Representative Christine Sinicki,
UWM School of Fresh Water Science,
State Agencies, and Advocates

Where: Cudahy High School Auditorium
4950 S. Lake Dr., Cudahy

When: Saturday, February 1, 2020, 1-3 p.m.

Presenting Guests:

Senator Chris Larson – 7th Senate District

Professor Rebecca Klaper – UWM School of Fresh Water Science

Carly Michiels – Clean Wisconsin

Ariana Hones – Wisconsin Conservation Voters



WISCONSIN STATE ASSEMBLY
Christine Sinicki
STATE REPRESENTATIVE

February 1, 2020

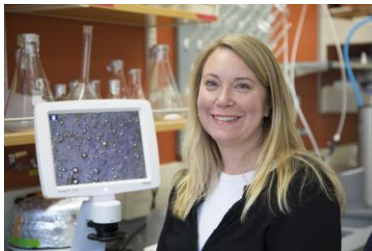
Public Informational Meeting on PFAs Pollution

Representative Christine Sinicki – 20th Assembly District



Christine Sinicki was born in Milwaukee in March of 1960. She was raised in the Bay View neighborhood and she is a graduate of Bay View High School. After graduation, Christine worked as a waitress until becoming manager of a small business in Bay View. In 1981 she married Michael Sinicki. She is the proud mother of two. Her involvement with her children’s education led her to a life of civil engagement and public service. She is a former PTA member and President. After learning first-hand the issues facing public education, she ran successfully for Milwaukee Public School Board in 1991. Christine served on the School board until 1998, when she was elected to the State Assembly.

Professor Rebecca Klaper – UW Milwaukee School of Fresh Water Sciences



Rebecca Klaper is a Professor and Director of the Great Lakes Genomics Center at the School of Freshwater Sciences, University of Wisconsin-Milwaukee. Dr. Klaper and her lab conduct basic and applied research to inform policy decisions involving freshwater resources. More specifically she studies the potential impact of emerging contaminants, such as nanoparticles, pharmaceuticals, and PFAS on aquatic life and the links the impact of these chemicals on the health of aquatic species to that of human health. In addition she examines the transport of emerging contaminants through wastewater treatment systems and into the environment and treatment technologies that may remove them from the waste stream. Dr. Klaper received her Ph.D. in Ecology from the Institute of Ecology, University of Georgia her M.S. in Entomology from UGA and her B.S. in Honors Biology at University of Illinois. She has been at UWM working on freshwater issues since 2003.

Carly Michiels – Clean Wisconsin



Carly is responsible for strategic advocacy and supporting the mission of Clean Wisconsin through directing policy goals as a government liaison with legislators and politicians in Wisconsin. Prior to joining Clean Wisconsin, Carly specialized in environment and energy issues while working as a Legislative Assistant for State Assembly Representative Gordon Hintz of Oshkosh, a member of the Joint Committee on Finance. Carly is a Northwoods native from Marinette and got her BA from UW-Madison in Political Science and Environmental Studies, and MPA from Indiana University in Environmental Policy and Natural Resource Management. She is passionate about water policy and smart, research based policy-making.

Ariana Hones – League of Conservation Voters



As the Southeast Organizer, Ariana works with volunteers, activists, and partner organizations in the community to hold our elected officials accountable for the decisions that they make regarding our natural resources and works to draw attention to important conservation issues in and around southeast Wisconsin.



State of Wisconsin
2019 - 2020 LEGISLATURE

LRB-3486/1
MCP:ahe&amn

2019 ASSEMBLY BILL 321

June 27, 2019 - Introduced by Representatives C. TAYLOR, GRUSZYNSKI, SARGENT, SINICKI, ANDERSON, ZAMARRIPA, STUBBS, STUCK, SUBECK, OHNSTAD, KOLSTE, EMERSON, SPREITZER, BILLINGS, CONSIDINE, HEBL, VINING and SHANKLAND, cosponsored by Senators MILLER, HANSEN, RISSER, LARSON, WIRCH, ERPENBACH, RINGHAND, SMITH, BEWLEY, SHILLING, CARPENTER, JOHNSON, SCHACHTNER and L. TAYLOR. Referred to Committee on Environment.

1 **AN ACT to amend** 292.31 (1) (d) (intro.); and **to create** 20.370 (4) (aa), 20.370 (4)
2 (ab), 20.370 (4) (ad), 20.370 (4) (ae), 20.370 (4) (ak), 160.07 (4) (f), 160.07 (7),
3 160.15 (4), 281.17 (8) (c), 285.27 (2) (bm), 292.31 (1) (d) 1m., 292.74 and 299.15
4 (2m) of the statutes; **relating to:** setting standards for certain contaminants,
5 providing information relating to off-site disposal of certain waste, extending
6 the time limit for emergency rule procedures, providing an exemption from
7 emergency rule procedures, granting rule-making authority, and making an
8 appropriation.

Analysis by the Legislative Reference Bureau

This bill requires the Department of Natural Resources to establish and enforce various standards for per- and poly-fluoroalkyl substances (PFAS). The PFAS group of substances includes several thousand chemicals; two of the most well known are perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS).

The bill requires DNR to establish, by rule, acceptable levels and standards, monitoring requirements, and required response actions for any PFAS in drinking water, groundwater, surface water, air, solid waste, beds of navigable waters, and soil and sediment, if the department determines that the substance may be harmful to human health or the environment. These rules must cover, at a minimum, PFOA and

ASSEMBLY BILL 321

PFOS, as well as perfluorohexane sulfonic acid (PFHxS), perfluorononanoic acid (PFNA), perfluorobutane sulfonic acid (PFBS), and perfluoroheptanoic acid (PFHpA). For air emission standards, DNR must first determine that an emission standard for a substance is needed to provide adequate protection for public health and welfare, which is also required for other hazardous air contaminants under current law. The bill also requires DNR to consider all PFAS to be air contaminants and to require reporting of any emission of PFAS.

Under current law, DNR maintains a list of substances that have a reasonable probability of entering the groundwater resources of the state and that are shown to involve public health concerns. Under this bill, DNR is required to add to this list PFOA, PFOS, PFHxS, PFNA, PFBS, PFHpA, and all other PFAS that have a reasonable probability of entering the groundwater resources of the state and that are shown to involve public health concerns. Under current law, the Department of Health Services recommends enforcement standards for substances on this list, which DNR then proposes as DNR rules in its rule-making process. Until DNR establishes such rules, the bill requires DNR to apply any DHS-recommended groundwater enforcement standard for any PFAS as an interim standard for groundwater and as an interim maximum containment level for drinking water.

The bill also provides that DNR may, if it determines doing so is necessary to protect human health or the environment, require a person who possesses or controls PFAS to provide proof of financial responsibility for remediation and long-term care to address contamination by a potential discharge of PFAS or environmental pollution that may be caused by a discharge of PFAS.

In addition, the bill requires DNR to set criteria for certifying laboratories to test for PFAS, and to certify laboratories that meet these criteria. Before these criteria are set, the bill allows DNR to require testing for PFAS to be done according to nationally recognized standards.

Finally, the bill requires a person who generates solid or hazardous waste at a site or facility under investigation by DNR to provide DNR with access to information relating to any transportation to or treatment, storage, or disposal at another site, facility, or location.

For further information see the *state* fiscal estimate, which will be printed as an appendix to this bill.

The people of the state of Wisconsin, represented in senate and assembly, do enact as follows:

- 1 **SECTION 1.** 20.005 (3) (schedule) of the statutes: at the appropriate place, insert
- 2 the following amounts for the purposes indicated:

What are PFAS?

PFAS are a group of human-made chemicals used for decades in numerous products.



stain-resistant carpet & fabric



non-stick cookware



firefighting foam



fast food packaging

Products that **may contain PFAS.**

What is Wisconsin Doing About It?



establishing PFAS health standards for drinking water, groundwater and surface water



soil & water testing



researching fish & wildlife



listening & feedback sessions



state collaboration

Additional efforts include a **PFAS Action Committee** (WisPAC) and a **PFAS Technical Advisory Group**.

Why Should I Care?

PFAS persist in the environment and the human body for long periods of time. Recent findings indicate that exposure to certain PFAS may have harmful health effects in people.



certain types of cancers



thyroid & heart issues



infertility & low birth weight



developmental delays

What You Can Do..



Test Your Water
dnr.wi.gov/u/?q=177



Check State Fish Advisories
dnr.wi.gov/u/?q=176



Learn More About PFAS Health Risks
dnr.wi.gov/u/?q=175



Visit dnr.wi.gov, search **PFAS**.



Perfluoroalkyls - ToxFAQs™

What are perfluoroalkyls (PFAs)?

Perfluoroalkyls (PFAs) are a group of man-made chemicals that are not found naturally in the environment. Some chemicals that are in this group PFAs include:

- perfluorooctanoic acid (PFOA)
- perfluorooctane sulfonic acid (PFOS)
- perfluorononanoic acid (PFNA)
- perfluorohexane sulfonic acid (PFHxS)
- perfluorodecanoic acid (PFDeA)

These PFAs were used to protect products like carpet and fabric, and as a coating for paper and cardboard packaging. They can also be found in some fire-fighting foams.

- The two PFAs made in the largest amounts in the United States were PFOA and PFOS. However, most companies have stopped making these two chemicals.

Where are PFAs found in the environment?

- PFAs can be found in air, soil, and water.
- They break down very slowly in air within days or weeks, but then fall to the ground where they can enter water or soil.
- PFAs do not break down in water or soil and may be carried over great distances by wind or rain.

How can I be exposed to PFAs?

- You may be exposed to PFAs in the air; in indoor dust, food, and water; and in some home products. However, the main sources of exposure to PFAs, such as PFOA and PFOS, are usually from eating food and drinking water that has these chemicals.
- Breast feeding infants may be exposed to PFAs since these chemicals have been found in breast milk. The benefits of breastfeeding are well known and almost always outweigh any potential risk, but you can talk with your doctor about concerns.

- Children can be exposed to PFAs in carpet since they are closer to the ground and play on the floor.
- Workers in facilities that make or use PFAs can be exposed to higher amounts of these chemicals and have higher levels in their blood.
- Some communities near factories that made or used PFOA and PFOS or in areas that used certain types of firefighting foam that spread into the environment may have been exposed to high levels of these substances in their drinking water.

How can PFAs affect my health?

A large number of studies have examined possible relationships between levels of PFAs in blood and harmful health effects in people. However, most of these studies analyzed only a small number of chemicals, and not all PFAs have the same health effects. Research suggests that high levels of certain PFAs **may**:

- increase cholesterol levels;
- decrease how well the body responds to vaccines;
- increase the risk of thyroid disease;
- decrease fertility in women;
- increase the risk of serious conditions like high blood pressure or pre-eclampsia in pregnant women;
- lower infant birth weights; however, the decrease in birth weight is small and may not affect the infant's health.

At this time, scientists are still learning about the health effects of exposures to mixtures of PFAs.

One way to learn about whether PFAs will harm people is to conduct studies in lab animals. Most of these studies have tested doses of PFOA and PFOS that are higher than levels found in the environment.

- These animal studies have found that PFOA and PFOS can cause damage to the liver and the immune system.
- PFOA and PFOS have also caused birth defects, delayed development, and newborn deaths in lab animals.

Humans and animals react differently to PFAs, and not all effects observed in animals may occur in humans.

- Scientists have ways to estimate how the exposure and effects in animals compare to what they would be in humans.
- What they learn from this process helps them decide how to protect people from harm caused by chemical exposure.

Perfluoroalkyls

Can PFAs cause cancer?

Studies do not clearly show whether PFAs cause cancer in people. People exposed to high levels may have increased risk of kidney cancer or testicular cancer. However, these studies are not consistent and may not have looked at other factors like smoking.

Studies in animals have shown that PFOA and PFOS can cause cancer in the liver, testes, pancreas, and thyroid. However, some scientists believe that humans may not develop the same cancers as animals.

The International Agency for Research on Cancer has classified PFOA as possibly carcinogenic (causing cancer) to humans, but it has not evaluated whether other PFAs may also cause cancer. The Department of Health and Human Services has not yet evaluated whether PFOA and other PFAs can cause cancer. The Environmental Protection (EPA) suggest that there is evidence that PFAs may have the potential to cause cancer.

How can I protect my family from exposure to PFAs?

- If you do not know about PFAs levels in your water, ask your local health department.
- If your drinking water contains PFAs above the EPA Lifetime Health Advisory, consider using an alternative or treated water source for any activity in which you might swallow water. Check for fish advisories for water bodies where you fish. Follow fish advisories that tell people to stop or limit eating fish from waters contaminated with PFAs or other compounds.

Can a medical test show whether I've been exposed to PFAs?

A blood test can measure individual PFAs compounds in your blood, but this is not a test routinely done in a doctor's office.

If you have PFAs in your blood, you have been exposed to these chemicals and absorbed them into your body at some time. However, having PFAs in your blood does not necessarily mean that you will become ill from PFAs.

Has the federal government made recommendations to protect human health?

The EPA has set drinking water levels for PFOA and PFOS of 70 parts per trillion. You can learn more by visiting: <https://www.epa.gov/ground-water-and-drinking-water/drinking-water-health-advisories-pfoa-and-pfos>.

Where can I get more information?

For more information, call CDC-INFO at 1-800-232-4636.

You can also get information on ATSDR's PFAS website: <https://www.atsdr.cdc.gov/pfas/index.html>.

You can also contact your community or state health or environmental quality department if you have any more questions or concerns.



**DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 128TH AIR REFUELING WING (ANG)**

28 JANUARY 2020

MEMORANDUM FOR STATE REPRESENTATIVE CHRISTINE SINICKI

FROM: 128 ARW/CC
1919 E Grange Ave
Milwaukee WI 53207-6142

SUBJECT: PFAS Informational Meeting

1. The 128th Air Refueling Wing (128 ARW) is unable to attend the public informational meeting that is being organized by your office for Feb. 1 at Cudahy High School. However, we are providing the following information and resources to be shared with the public.

2. The 128 ARW is following the Air Force response regarding perfluorooctane sulfate (PFOS) and perfluorooctanoic acid (PFOA). The 128 ARW is working with stakeholders, to include Milwaukee Mitchell International Airport, Air Force Civil Engineer Center, Air National Guard Readiness Center, by using a three-step approach – identify, respond, and prevent.

a. Identify - The 128 ARW is conducting investigation work and response actions guided by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The 128 ARW has completed both the preliminary assessment and site inspection and is pursuing the next step of remedial investigation. In addition, the 128 ARW is coordinating with Milwaukee Mitchell International Airport to complete a work plan in accordance with the Wisconsin Department of Natural Resources' (WI DNR) hazardous substance spill law.

b. Respond – The Air Force Civil Engineer Center is ready to respond to drinking water impacts that exceed the Environmental Protection Agency (EPA) lifetime health advisory level of 70 parts per trillion. There are no identified drinking water systems in the surrounding neighborhoods exceeding the EPA lifetime health advisory level.

c. Prevent - The 128 ARW has replaced the aqueous film forming foam (AFFF) in fire trucks, stockpiles, and hangar fire suppression systems with a more environmentally responsible formulation as required by the Department of Defense. Fire trucks at the 128 ARW have been retrofitted with a system that prevents foam discharge during equipment testing and training. The 128 ARW is following Air Force guidance which only allows discharge of foam during real-world fire emergencies.

3. The Wisconsin National Guard also is working in cooperation with the Wisconsin DNR regarding PFOS/PFOA concerns at its facilities, including the 128 ARW. The 128 ARW is

committed to participating in any local informational meetings on this issue hosted by the Wisconsin DNR.

4. The 128 ARW is a community partner by providing fire and emergency support to aircraft emergencies at Milwaukee Mitchell International Airport, as well as, responds regularly to mutual aid calls from local communities including Cudahy, Milwaukee, Oak Creek, St. Francis, and South Milwaukee.

5. The 128 ARW recommends the following website resources describing the Air Force and Department of Defense response.

a. Air Force Civil Engineer Center

[\(https://www.afcec.af.mil/WhatWeDo/Environment/Perfluorinated-Compounds/\)](https://www.afcec.af.mil/WhatWeDo/Environment/Perfluorinated-Compounds/)

b. Department of Defense

[\(https://www.defense.gov/Explore/Spotlight/pfas/\)](https://www.defense.gov/Explore/Spotlight/pfas/)

6. Any inquiries can be directed to the 128 ARW Public Affairs office by calling 414-944-8715 or preferably by email at usaf.wi.128-arw.list.environmental-affairs@mail.mil.

JAMES V. LOCKE, Colonel, WI ANG
Commander

PROTECT OUR WATER RESOURCES FROM PFAS



Per- and polyfluoroalkyl substances (PFAS)

PFAS are an emerging human-made contaminant, they are harmful "forever chemicals" that build up in the body and environment over time. PFAS can have serious health effects and are already contaminating Wisconsin's water resources.

Background

- PFAS chemicals have long been utilized in products such as Teflon, water resistant clothing, food packaging, and firefighting foam.
- Once released into the air, soil, and waterways PFAS can easily make their way into drinking water sources.
- PFAS are very persistent in the environment and body.
- The three most likely places to find high levels of PFAS:
 - Near companies that manufacture products that use PFAS materials.
 - Places such as military airfields or training bases that are heavy users of PFAS.
 - Wastewater treatment plants.
- The federal EPA does not regulate PFAS. The EPA has a recommended, unenforceable Health Advisory Limit (HAL) of 70 parts per trillion (ppt).

Public Health

- PFAS pose the greatest risk to developing fetus and infants.
- PFAS health effects may include:
 - growth, learning, and behavioral problems in children
 - interfere with hormones
 - decreases women's fertility
 - increase cholesterol
 - interfere with immune system and vaccine response
 - increase likelihood of cancer
- Protecting public health requires a science-based collaborative approach when addressing PFAS.

www.cleanwisconsin.org

4

public drinking water supplies in WI have detected high levels of PFAS

15

states have set standards at or below the EPA's recommended limit

There are over

30

PFAS contamination sites under investigation in Wisconsin

One source of drinking water in Marinette, WI tested above

1,900 ppt

which is **95 times** the proposed state health standard

Governor Evers and legislators have already prioritized PFAS pollution.

Join Clean Wisconsin in supporting PFAS solutions:

SUPPORT

Senate Bill 302, The CLEAR Act as one of the most comprehensive bills in the nation on PFAS.

Write your legislator to support The CLEAR Act!

Take Action:

<https://www.cleanwisconsin.org/actions/lawmakers-need-to-support-the-clear-act/>

SUPPORT

The science-based work at the WI Dept. of Natural Resources in creating increased protections from PFAS pollution in our drinking water, surface water, and groundwater.

SUPPORT

A statewide PFAS groundwater standard of 20 ppt that the Dept. of Health determined was safe for public health.

SUPPORT

Research-based protections and all efforts to limit PFAS contamination in our waterways.

Contact:

Scott Laeser
Water Program Director
608-251-7020 ext. 13

Carly Michiels
Government Affairs Director
608-251-7020 ext. 30


cleanwisconsin



PFAS IN OUR WATER

PFAS may harm a child's development, damage your liver, and increase your risk of cancer.¹



Per- and polyfluoroalkyl substances (PFAS) are a group of chemicals resistant to heat, water, and oil. For decades, PFAS have been used for industrial applications and consumer products such as carpeting, waterproof clothing, upholstery, food packaging, firefighting foam, and various paper products.

Often referred to as “forever chemicals,” PFAS do not break-down in the environment. Municipalities release the compounds in treated wastewater and sewage sludge that is applied to farm fields as fertilizer.

There is mounting evidence linking PFAS to a range of negative health effects including:

- Cancer
- Liver damage
- Decreased fertility
- Increased risk of asthma
- Increased risk of thyroid disease
- Growth, learning, and behavior impairment
- Interference with the body's natural hormones
- Increased cholesterol levels²

Truth is, we don't know how widespread the exposure to these dangerous chemicals might be. There are no state or federal guidelines establishing what levels of these chemicals are acceptable in our drinking water.

We don't know for how long or how many of us have been drinking PFAS contaminated water, or understanding the consequences for our health.



Janell's story

Tyco Fire Products in Peshtigo knew its toxic products were contaminating groundwater for four years before notifying residents.

Local mom Janell Goldsmith, and her husband Duane, who live near the plant, twice tested their well water and found PFAS contamination above the federal health advisory threshold.

Duane has been diagnosed with gastrointestinal cancer while Janell suffered pregnancy-induced high blood pressure. The couple's two children also have had developmental delays.³



An assault on our most vulnerable

The major types of human exposure sources for PFAS include contaminated drinking water and ingesting food contaminated with PFAS.

PFAS research also shows that the developing fetus can be exposed to PFAS when umbilical cord blood from their mothers crosses the placenta during pregnancy.

Newborns can be exposed to PFAS through breast milk.

Older children may be exposed to PFAS through food and water, similar to adults.

In addition, toddlers and young children have a higher risk of exposure to PFAS from stain-resistant carpeting and similar products, largely due to time spent lying and crawling on floors in their early years.⁵

The tip of the iceberg

Of the more than 11,000 public drinking water systems in Wisconsin, only about 90 have been tested for PFAS.⁴



Firefighting foam, pictured above, is one of many sources of PFAS. Because of that, PFAS are prevalent in communities where there are military bases, firefighting training centers, and manufacturers of the foam. However, we've only begun to scratch the surface on where these chemicals are most likely to be contaminating our drinking water.

DNR secretary designee Preston Cole recently requested that 125 water systems be tested for PFAS. Those communities include:

- Antigo
- Brookfield
- Chippewa Falls
- Clintonville
- Elroy
- Fennimore
- Madison
- Marinette
- Milwaukee
- Monroe
- Muscoda
- Peshtigo
- Plover
- Reedsburg
- Richland Center
- Sparta
- Stevens Point
- Sturgeon Bay
- Tomahawk
- Tomah
- Westfield

The solution

The **CLEAR Act (SB 302/AB321)** is a comprehensive approach to preventing and remediating PFAS pollution. The bill would:

- Require the DNR to establish health standards in drinking water, surface water, groundwater, soil, and air.
- Require the clean up of PFAS chemicals where they are found.

Will you support the CLEAR Act, SB 302/AB 321?

SOURCES: 1. https://www.michigan.gov/som/0,4669,7-192-45414_45929_83470_83473-452154--,00.html; 2. https://www.michigan.gov/som/0,4669,7-192-45414_45929_83470_83473-452154--,00.html; 3. <https://www.jsonline.com/story/news/local/wisconsin/2019/02/04/tyco-waited-4-years-disclose-toxins-wisconsin-drinking-wells/2727670002/>; 4. https://www.michigan.gov/som/0,4669,7-192-45414_45929_83470_83473-452154--,00.html; 5. <https://cswab.org/wp-content/uploads/2018/10/Wisconsin-PFAS-Tip-of-the-Iceberg-Flyer-1.pdf>

January 31, 2020

Public comment on EPA-HQ-TRI-2019-0375

EPA Proposed Rule – Addition of Certain Per- and Polyfluoroalkyl Substances: Community Right-to-Know Toxic Chemical Release Reporting

PFAS contamination has been detected in soil and groundwater in communities throughout **Wisconsin** including Camp Douglas, Chilton City, Hudson, La Crosse, Madison, Manitowoc, Marinette, Middleton, Milwaukee, Rhinelander, South Milwaukee, Sparta, and Superior.

Altogether, 36 PFAS compounds have been detected in or pose a significant threat to Wisconsin's groundwater resources. In response to formal petitions from Citizens for Safe Water Around Badger (CSWAB), state health officials are currently working on health-based standards for all 36 compounds in groundwater – the primary source of drinking water for Wisconsin residents.

We encourage the EPA to list **ALL** per- and polyfluoroalkyl substances (PFAS) that the Agency has permitted chemical industry to manufacture, making all PFAS subject to reporting under section 313 of the Emergency Planning and Community Right-to-Know Act and section 6607 of the Pollution Prevention Act (more commonly known as the Toxics Release Inventory or TRI).

In conjunction with other information, TRI data can be an effective tool in evaluating exposures and the risks posed by both direct and indirect exposures to PFAS. Detailed information on the releases and waste management quantities from facilities will assist EPA, state regulators, health officials, site workers and the public identify potential sources of exposure to PFAS.

As highly persistent, bioaccumulative, and toxic (PBT) chemicals, PFAS should be regulated as chemicals of special concern with correspondingly low reporting thresholds. As with other PBT chemicals with very high persistence and bioaccumulation values, the reporting limit for the summed total of all PFAS should be zero. This is consistent with proposed Wisconsin legislation such as the CLEAR Act which will require regulators to “consider all known perfluoroalkyl or polyfluoroalkyl substances to be air contaminants” with a reporting level of “zero pounds per year”.

Further, listing of individual PFAS compounds on the TRI is made necessary by the fact that manufacturers and responsible parties uniformly refuse to disclose PFAS product content and composition, arguing that such information is proprietary. This secrecy places public health and the environment at risk by unilaterally blocking the accurate assessment of risk, compromising the successful design and selection of remedial actions, and obstructing the public's right to know.

Annie Appleseed Project
Citizens Advisory Committee of the Town of Peshtigo
Clean Water Action Council of Northeast Wisconsin.
Coalition to Save the Menominee River
Concerned Friends & Neighbors of SOH2O
Crawford Stewardship Project
Citizens for Safe Water Around Badger (CSWAB)
Eastside Planning Council- Madison, WI
Echo Valley Hope
Ethos Green Power
Family Farm Defenders
Friends of Lake Wingra
Friends of Starkweather Creek
League of Women Voters of Wisconsin
Madison Audubon Society

Midwest Environmental Advocates
Midwest Environmental Justice Organization
Physicians for Social Responsibility Wisconsin
Project Outreach
Quint LLC
Safe Skies Clean Water Wisconsin
The Cornucopia Institute
Twin Ports Action Alliance
Valley Stewardship Network
Viroqua Climate Group
WI Network for Peace, Justice & Sustainability
Wisconsin Resources Protection Council
Wisconsin Alliance for Women's Health
Wisconsin Conservation Voters
Wisconsin Environmental Health Network

SUBMITTED online via U.S. EPA website by:

Laura Olah, Executive Director, Citizens for Safe Water Around Badger, E12629 Weigand's Bay South, Merrimac, WI 53561 on behalf of the above **30 environmental and social justice organizations – all from Wisconsin.**