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VIA EMAIL

kathrynm.stromhiorns@wisconsin.gov

Kathryn Stromhiorns
Wisconsin Department of Natural Resources
101 S. Webster Street
P.O. Box 7921
Madison, WI 53707

RE: Comments of the Municipal Environmental Group – Wastewater Division
Emergency Rule WA-06-20(E) Relating to PFAS-containing Firefighting Foam

Dear Ms. Stromhiorns:

I am submitting these comments on behalf of the Municipal Environmental Group–Wastewater Division (MEG Wastewater). MEG Wastewater is an organization of approximately 100 municipalities statewide who own and operate wastewater treatment plants. We represent facilities ranging in size from small sanitary districts to larger utilities such as Racine and Green Bay.

MEG appreciates the revisions the Department has made to proposed emergency rule NR 159 clarifying that the proposed treatment indicator parameters are not effluent limitations. In particular, MEG supports the revised rule language at § NR 159.08(1)(b)4., the removal of the reference to effluent standards previously contained in § NR 159.08(1)(b)1. and Table 1 as initially proposed, and the inclusion of the note on page 18. These revisions are necessary to clarify that this rule is limited to the specific issue of treatment and disposal of PFAS-containing firefighting foams and is not intended to be used to establish effluent limitations under Wis. Stat. ch. 283.

In addition, MEG supports the inclusion of the second version of Table 1, in green in the draft rule, rather than the inclusion of the first version of Table 1, in blue. MEG reiterates its position that PFAS regulations, including the action levels in these tables, should be developed based on sound science.

Best regards,

STAFFORD ROSENBAUM LLP

/s/ Vanessa D. Wishart

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