



10/25/2022

The Honorable Michael S. Regan
Administrator, U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20004

Re: Comments on the Proposed Designation of Perfluorooctanoic Acid (PFOS) and Perfluorooctanesulfonic Acid (PFOA) as Hazardous Substances under CERCLA

[Docket No. EPA-HQ-OLEM-2019-0341]

Dear Mr. Regan,

Please accept these comments on behalf of the Town of Peshtigo Town Board, Peshtigo, WI. We strongly support the designation of perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS), including their salts and structural isomers, as hazardous substances under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as proposed by the U.S. Environmental Protection Agency (EPA) on September 6, 2022.

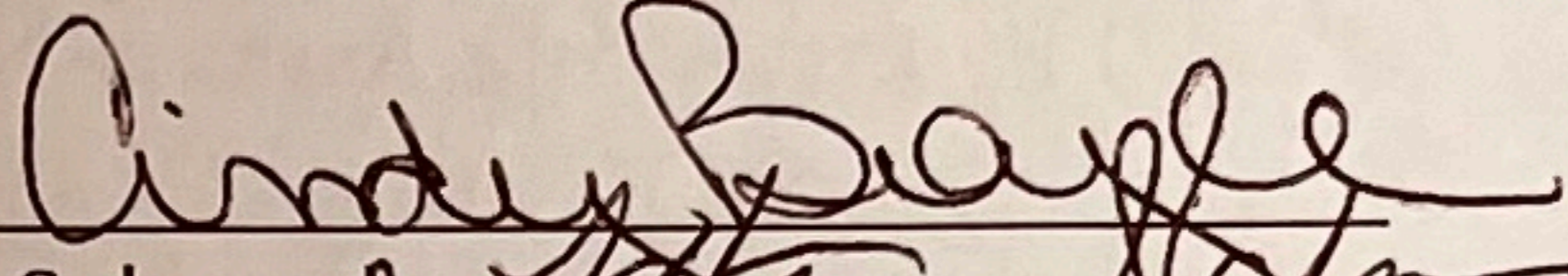
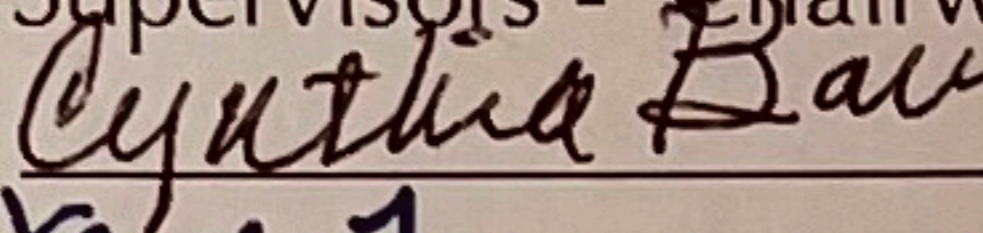
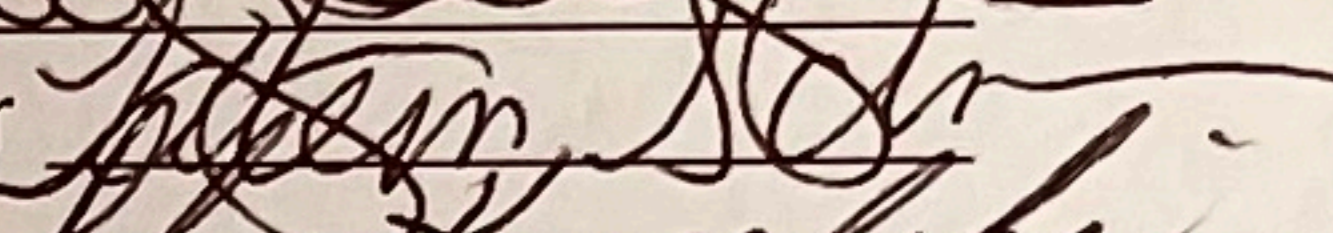
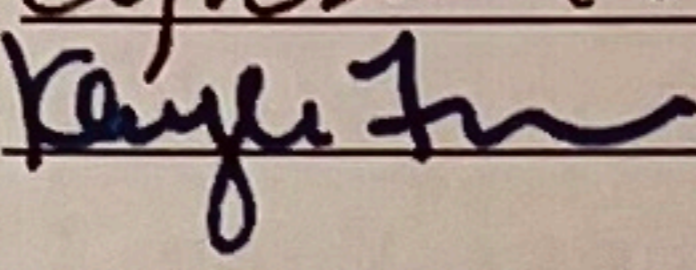
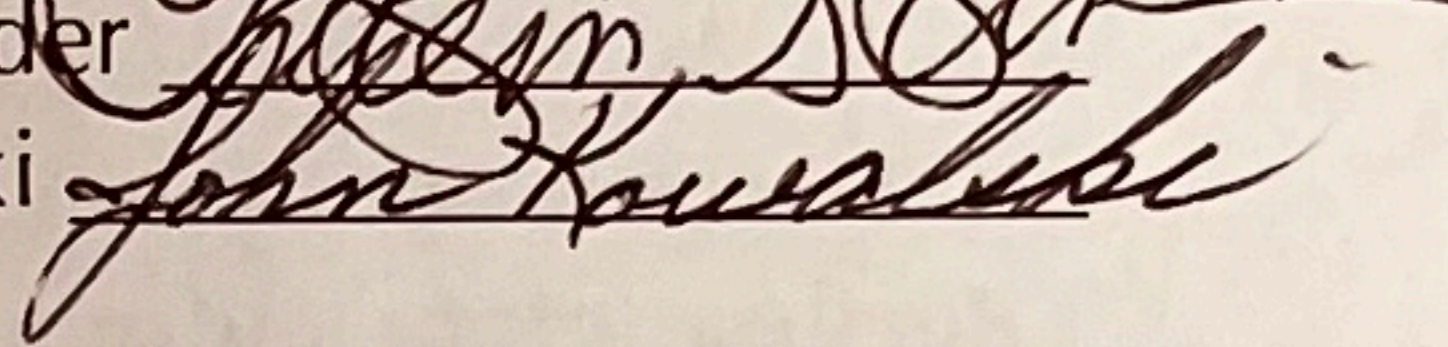
For over 50 years, releases from the manufacturing and testing of aqueous film forming foam from facilities owned by Johnson Controls International/Tyco Fire Products have caused extensive harm to health and property within the Town of Peshtigo. In 2013 Johnson Controls/Tyco discovered PFAS contamination at their fire training facility in amounts exceeding 400,000 parts per trillion (ppt). In 2016, they finally reported it to the Wisconsin Department of Natural Resources (WDNR) claiming the contamination had been contained on their facility. In the Fall of 2017 testing was done of homes within the City of Marinette who were not connected to municipal water. It was that act which prompted Town of Peshtigo residents to become concerned and demand testing. In the Fall of 2017, PFAS was first reported in the adjacent Town of Peshtigo private drinking wells. The WDNR has worked to understand the complexities around the investigation area and protect public health, but the identified responsible party is disputing responsibility and not treating all residents within the plume with equal protections. In 2022 the State of WI passed minimal PFAS standards for drinking water and surface water but failed to pass any standards for those Wisconsinites drinking groundwater from private drinking wells, consequently leaving Town of Peshtigo residents at severe risk. Almost 40% of Wisconsinites have groundwater as their drinking water source.

As of February 2022, approximately 945 parcels and 1,359 residents in the Town of Peshtigo are within the PFAS contamination plume contaminating 545 private drinking wells. Some private drinking wells have detected levels as high as 2,200 ppt.

While the Town of Peshtigo has been told we do not have a large enough population to qualify for an epidemiology study we have had health care providers reference the high amount of thyroid

disease and unusual health outcomes in our area, as well as impacted residents report personal injuries linked to this exposure. Cases of testicular cancer, kidney cancer and disease, thyroid disease, ulcerative colitis, low birth weight, delayed development etc. appear to be prevalent, impacting family after family in devastating measure.

EPA plays a critical role in responding to pollution of hazardous substances that when released to the environment pose a substantial danger to public health. Thus, the Town of Peshtigo supports EPA's concrete first step towards alleviating the dangers that PFAS contamination poses to our communities and thanks you for proceeding with these protective measures.

Town of Peshtigo Board of Supervisors - Chairwoman Cindy Boyle 
Supervisor 1 Cynthia Baur  Supervisor 2 Tatum Schroeder 
Supervisor 3 Kayla Furton  Supervisor 4 John Kowalski 

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