



Wisconsin Counties

Solid Waste Management Association

Wisconsin Department of Natural Resources
Clean Water Fund Program – Intended Use Plan

To Whom it May Concern:

The Wisconsin Counties Solid Waste Management Association (WCSWMA) is providing this Letter of Endorsement for the position statement being submitted by Marathon County Solid Waste Department on the Clean Water Fund Program Intended Use Plan (CWFP IUP).

The municipal solid waste industry in Wisconsin works to ensure residents and businesses of the State have a system for managing waste and recycling generated on a daily basis. This system strives to ensure cost effectiveness, sustainability, and most importantly, protection to human health and the environment. As stewards of the environment, WCSWMA works to establish best practices for handling waste and recycling to ensure minimal impact to our natural resources. As Per- and Polyfluoroalkyl Substances (PFAS) become more regulated, it will be important to understand the critical role municipal landfills serve in keeping these substances out of the environment.

PFAS in landfill leachate is not the doing of one generator, but rather a combination of waste from residents, business, and organizations that is placed in a relatively concentrated area. Landfills should not be considered sources, but rather passive receivers of these PFAS compounds. With an increasing number of municipal water treatment plants unable to provide treatment support, landfills are evaluating on-site solutions such as reverse osmosis, ion exchange, and granular activated carbon. The greatest challenge for municipal organizations with on-site treatment is the high cost of capital and annual operating expense. Municipal solid waste facilities operate in a manner to cover their expenses, and thus many do not have the financial capacity to construct and operate such advanced treatment plants.

Municipally owned landfills should not be classified as revenue-generating businesses. WCSWMA concurs with Marathon County's comment and is asking the Wisconsin Department of Natural Resources to reevaluate its position on municipally owned landfills operated by local government.

The ability to assist in efforts to clean Wisconsin's environment is dependent on the support received from the regulatory agencies. This letter is aligned with WCSWMA's mission to promote effective, environmentally sound waste management and resource recovery efforts. Thank you for taking time to understand our concerns and support efforts to protect our environmental resources.

Thank you,

Allison Birr – Chair WCSWMA



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