



**Washington Association
of Sewer & Water Districts**

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May 31, 2018

Ms. Kara Steward

Hazardous Waste and Toxics Reduction Program

PO Box 47600

Olympia, WA 98504

RE: Interim PFAS CAP

Dear Ms. Steward:

Thank you for the opportunity to comment on the Interim PFAS CAP. We commend the work of the committee in developing this interim CAP, with the recognition that there is still much work to be done as studies currently underway refine our knowledge of the extent of the problem as it relates to drinking water supplies.

The Washington Association of Sewer & Water Districts represents more than 180 public sewer and water districts in the state, serving nearly 25% of our state's population. These districts provide cost-effective sewer and water services—ranging from the state's largest population centers, to the smallest rural communities. Clean water is a major concern to both our membership and the clients they serve. The potential for contamination is always a concern, especially since, beyond our wellheads and collection points, we have no control over what is sprayed, injected, discharged or built proximal to our facilities. The situation developing with PFAS is especially disturbing, based on the longevity of the compounds, and their ability to travel long distances over time, as evidenced by the circumstances in Issaquah.

Section 1.3 of the CAP—**Implement methods to reduce PFAS in drinking water**—briefly discusses the need for technical assistance from DOH to aid affected water systems in understanding mitigation options and guide voluntary action on unregulated PFAS until rulemaking is complete. It also refers to estimates of \$30k-60k that will be needed to provide this service to each affected water provider, with additional funding required to support mitigation costs. We support this approach in the interim. In Section 2.2—**Identify methods to reduce exposure to contamination**—there are actual costs listed for 4 PFAS cleanups, some with ongoing costs for maintenance of systems to remove the chemicals. We maintain that this



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type of cost would be well beyond the ability of many water systems. We would suggest that more time and effort, with the possibility of legislation, be explored for providing full assistance and ongoing mitigation costs to water providers affected by these chemicals. The statement in Section 2.2 suggesting that public providers may apply to DOE for Remedial Action Grants is simply not enough. There must be long term assistance for affected providers that were impacted by sources other than the Department of Defense (who should be responsible for those they affect). We recognize that this is an interim plan, and much remains to be done, but a more robust discussion on long term assistance for affected water systems is warranted.

Public water systems are critical to the well-being of their communities. Keeping them financially solvent is a benefit not only to consumers, but to the counties and state that must continue to operate them if they default.

We look forward to participating further as this CAP and the standards development proceed. If at any time you need the perspective of public purveyors, please contact us.

Sincerely,

A handwritten signature in blue ink that reads "Jeff Clarke". The signature is fluid and cursive.

Jeff Clarke

Board President