

**Environmental Health Services Division**

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Kara Steward  
Hazardous Waste and Toxics Reduction Program  
Washington State Department of Ecology  
300 Desmond Drive SE  
Lacey, WA 9850

May 8, 2019

RE: Commentary on May 15 Webinar

Dear Ms. Steward,

Thank you for your ongoing work to create a per- and poly-fluoroalkyl substances (PFAS) chemical action plan (CAP). Public Health – Seattle & King County (PHSKC) appreciates the ongoing collaboration with the Department of Ecology (Ecology) to identify sources and recommend actions to reduce the use, release, and exposure of PFAS in Washington. We are looking forward to having a productive discussion on the PFAS CAP during the May 15, 2019 webinar and providing commentary this summer.

PFAS is a chief concern for PHSKC based on its potential harm to human health and the environment. Despite Washington State's progressive steps to limit the sale and use of PFAS containing firefighting foams and to explore safer alternatives for food contact materials, other sources and exposures remain inadequately monitored or controlled. To protect residents, we would like to strengthen the CAP to incorporate progressive means of understanding and tackling harmful PFAS exposures. The creation of recommendations and the format of the chapters for the PFAS CAP are not consistent with other CAPs from Ecology, and we worry that this may present unforeseen gaps and lack of guidance in the future.

As Ecology moves forward in finalizing its PFAS CAP draft, PHSKC and its interagency partners have five recommendations to improve the PFAS CAP process and provide a more transparent and inclusive process between PHSKC, Ecology, and the many PFAS CAP stakeholders. In the spirit of collaboration, we respectfully request that the following recommendations to the PFAS CAP and PFAS CAP process be made:

1. PHSKC and our King County interagency partners are pleased with the passage of SB 5135. When implemented, the bill provides the Department of Ecology with explicit authority to address PFAS in consumer products in Washington State. Ultimately, SB 5135, , will change the legal landscape surrounding PFAS by providing Ecology new abilities to understand, prevent, and regulate the substance. Currently, the draft PFAS CAP recommendations briefly mention the passage of SB 5135. PHSKC recommends that SB 5135's provisions are better incorporated in the final draft. Furthermore, PHSKC recommends that the May 15<sup>th</sup> webinar include an opportunity for stakeholders to ask questions about Ecology's plans for implementing the SB 5135 relative to the PFAS CAP.

2. Currently, the PFAS CAP chapters lack cohesiveness in both style and content. For example, some chapters contain recommendations while others do not. We are concerned that stakeholders will be unable to provide meaningful commentary. PHSKC recommends that Ecology format the PFAS CAP so that structure and content match across chapters.
3. The PFAS CAP process has obfuscated how the recommendations have been made. Based on the information provided by Ecology, it is unclear how the stakeholder commentary and the appendix information were used to create the recommendations. PHSKC recommends that Ecology provide information on how the scientific data and stakeholder feedback/commentary have been incorporated and the process used to select and prioritize the recommendations.
4. The information regarding the May 15 conference call and the PFAS CAP process is limited. More information on the call's intended purpose and format should be provided would help to ensure a fruitful meeting.
5. PSHKC appreciates the work done by the Department of Health and Ecology to include community input and equity considerations into the CAP recommendations for drinking water and contaminated sites. We would like to see more equity analyses in the CAP chapters, which would make it easier to develop equitable recommendations. PHSKC recommends that Ecology include a holistic racial and socioeconomic analysis that incorporates equity and social justice principles cohesively into each chapter and recommendation.

As always, thank you for supporting the ongoing collaboration between PHSKC and Ecology. We are thankful that Ecology is undertaking this important work to prevent harmful exposures to PFAS. If you have any questions or comments, please contact Matthew Bangcaya, Policy Liaison, at [mbangcaya@kingcounty.gov](mailto:mbangcaya@kingcounty.gov) or 206-477-4764.

Sincerely,

A handwritten signature in black ink that reads "Darrell A. Rodgers". The signature is written in a cursive style with a horizontal line underneath the name.

Darrell A. Rodgers, PhD, MPH, EMBA  
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Public Health – Seattle & King County  
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