



King County

Department of Natural Resources and Parks
Wastewater Treatment Division

King Street Center, KSC-NR-0500
201 South Jackson Street
Seattle, WA 98104-3855

December 24, 2020

VIA ELECTRONIC MAIL

Irina Makarow
Washington State Department of Ecology
PO Box 47600
Olympia, WA 98504-7600
c/o ChemActionPlans@ecy.wa.gov

RE: Draft PFAS Chemical Action Plan Comments

Dear Ms. Makarow:

Thank you for the opportunity to comment on the Washington State Departments of Ecology and Health's (DOH) Draft Per- and Polyfluoroalkyl Substances (PFAS) Chemical Action Plan (CAP). I appreciate the work that Ecology and DOH are undertaking to address this pervasive and persistent chemical, on behalf of human and environmental health.

King County's Wastewater Treatment Division (WTD) serves about 1.8 million people within a 424 square mile service area including most urban areas of King County and parts of Snohomish and Pierce Counties. In 2019, our three regional treatment plants and two smaller treatment plants treated a combined daily average of 178 million gallons of wastewater, and together produced 124,958 wet tons of biosolids that were land applied to forests and farms in Washington as a beneficial soil amendment. As one of the largest wastewater treatment utilities in the state, recommendations in the PFAS CAP have significant impacts for our 1.8 million wastewater ratepayers and the agriculture and forestry customers that beneficially use 100 percent of WTD's biosolids.

First and foremost, WTD strongly supports all measures in the CAP aimed at source control. Wastewater is not a "source" of PFAS; it is the PFAS produced or used in our homes and businesses that enters the wastewater stream. Source control is most efficient action we can take to control PFAS exposure for humans and the environment. Cradle to grave management of this chemical is essential, otherwise the problem is merely shifted to another pathway.

WTD generally supports the recommendations aimed at evaluating PFAS in wastewater treatment and biosolids management (Recommendations 4.1 and 4.3, respectively). In reviewing the recommendations, we suggest some refinements, below, that could result in more accurate results and provide a stronger foundation for Ecology to consider any new regulations.

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Recommendation 4.1 - Evaluate PFAS in wastewater treatment:

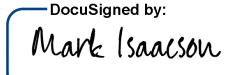
- Second bullet states that “study design should ensure that the sampled WWTPs [wastewater treatment plants] either receive industrial discharges that are likely to contain PFAS or have drinking water sources with known PFAS contamination.”
 - Suggest the study design should be amended to also sample WWTPs with mostly residential sources. This would increase understanding of residential versus industrial loading of PFAS to wastewater flows entering the treatment plants. The final bullet states that Ecology may require PFAS monitoring for domestic as well as industrial WWTPs. In order to inform any decision by Ecology about future requirements for monitoring or compliance in domestic WWTPs, it is important that PFAS in domestic WWTPs be studied as well.
 - Consider WWTPs that receive landfill leachate for further treatment, in coordination with any studies done as part of Recommendation 4.2 (Evaluate landfill PFAS emissions). This is an opportunity to coordinate and maximize these evaluations to better understand the linkages between the impact of any PFAS found in landfill leachate on wastewater treatment—while neither is a source of PFAS, these two pathways are often linked.

Recommendation 4.3 – Evaluate Washington biosolids management

- The fifth bullet recommends “Investigate land application sites where procedures mimic rates and practices under current state rule.”
 - WTD supports this recommendation and asks that it be updated to specify that the research should include 1) non-biosolids amended control samples to quantify background concentrations of PFAS in the soil, and 2) field replications given difficulties with sample contamination.
- The sixth bullet recommends “Evaluate realistic exposure pathways.”
 - WTD supports this recommendation and asks that it be updated to specify that these realistic exposure pathways should be science-based and peer-reviewed.

WTD appreciates the opportunity to offer comments on the Draft PFAS CAP. This vital work will assist in addressing source control and impacts to human and environmental health from this chemical. If you have any questions regarding WTD’s comments, please contact WTD’s Resource Recovery Research and Policy Project Manager Erika Kinno at erika.kinno@kingcounty.gov or 206-477-0942.

Sincerely,

DocuSigned by:

Mark Isaacson
Division Director

cc: Rebecca Singer, Resource Recovery Section Manager, King County Wastewater Treatment Division (WTD)
Erika Kinno, Research and Policy PPM, Resource Recovery Section, WTD