



Eastside Fire & Rescue

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December 21, 2020

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HWTR-HQ

Washington State Department of Ecology
Hazardous Waste and Toxics Reduction Program
PO Box 47600
Olympia, Washington 98504-7600

RE: Public Comment for Per- and Polyfluoroalkyl Substances Draft Chemical Action Plan

Dear Public Outreach Officer,

We have reviewed the Washington State Department of Ecology (Ecology) Draft for Public Comment Per- and Polyfluoroalkyl Substances (PFAS) Draft Chemical Action Plan (CAP) and appreciate the opportunity to provide comments on this document.

Among other things, the CAP recommends the Washington State Legislature, State Agencies, and local entities should work together to fund mitigation measures for drinking water affected by PFAS. Specific funding mechanisms are identified for improving service supply water infrastructure (i.e. Public Works Assistance, Federal Grants). However, a potential funding gap appears to remain for local agencies and governments to characterize and ultimately remediate PFAS contamination in soil, groundwater, and surface water that may impact drinking water resources. While future funding may later be available through Remedial Action Grants for PFAS listed as hazardous substances, this approach does not appear to address potential sources to groundwater comprised of PFAS-precursors or individual PFAS that are not yet listed as hazardous substances or that may remain unlisted for some period into the future.

While the CAP is clear that Ecology will provide technical assistance to local jurisdictions for investigation and monitoring where PFAS contamination is discovered, it is not clear whether this will include currently non-listed PFAS. The specific funding mechanism and process for local agencies to apply and receive funding is similarly undefined. Our experience evaluating the PFAS releases in the Lower Issaquah Valley indicates that the process can be costly and even if Ecology provides assistance for just a few sites it may represent a significant proportion of the \$3.48 million dollars allocated to implementation of the entire CAP¹. Without supplemental targeted funding to support these efforts that is not contingent on listing as a hazardous substance the high cost of

¹ Bill Request # z-0076.2/20 2nd Draft



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investigation and cleanup of potential PFAS sites is likely to prove prohibitive to making meaningful progress addressing them.

Therefore, we recommend clarifying the language of the CAP to 1) identify when PFAS assistance is dependent on first receiving a hazardous substance listing for the individual chemical; and 2) clarify the needed funding mechanisms for investigation and remediation of PFAS sources in soil, groundwater, and surface water and how local agencies can work with Ecology to ensure ongoing investigations are completed to protect human health and the environment.

Again, we appreciate the opportunity to provide comments and look forward to continuing to work with Ecology in the future.

Respectfully,

A handwritten signature in black ink, appearing to read "Jeff Clark".

Jeff Clark
Fire Chief