



WASHINGTON REFUSE & RECYCLING ASSOCIATION

December 15, 2020

Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

To Whom it May Concern:

The Washington Refuse and Recycling Association (WRRA) is the oldest Solid Waste Trade Association operating on the West Coast of the United States, founded 73 years ago. WRRA represents the private sector solid waste and real recycling industry in Washington, from curbside collection service, state of the art recycling facilities, to landfills. WRRA member companies and the solid waste industry serve a vital role in public health, safety, and environmental protection.

Our members work in their communities every day and provide essential services. Washington's solid waste system is a successful public-private partnership. Washington's regulated and municipal solid waste collection system provides for excellent service, has consistently beat the national recycling rate by double digits, and maintains family wage jobs in every community in which we operate—all at a transparent and affordable price. We have an obligation to serve and to provide universal service as directed by the state and local governments.

Thank you for the opportunity to comment on the Draft PFAS Chemical Action Plan (CAP). WRRA is generally supportive of the department's efforts to measure per- and polyfluoroalkyl substances (PFAS) contamination and reduce PFAS exposure. A number of WRRA members that own and operate landfills in Washington will also comment on the draft plan. The National Waste & Recycling Association (NWRA) will also submit detailed technical comments on the proposed plan. WRRA will not duplicate those comments, but supports and incorporates the comments submitted by NWRA and member companies. WRRA's comments are intended to supplement and augment the well-researched and technical comments submitted by the industry.

WRRRA members and their operations neither manufacture nor use PFAS. WRRRA members receive waste containing PFAS from the communities and industries they serve. The most effective way to manage PFAS in the environment is to reduce the presence of PFAS in products in the first place. Upstream reductions targeted at the producers of PFAS-containing products will always be the most effective means to reduce public exposure to PFAS. It is important to note that as long as these chemicals are present in products and packaging, they will be present in landfill leachate.

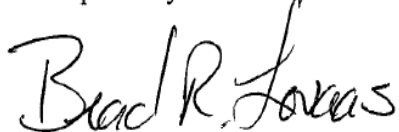
It is important to note that so long as PFAS remain abundant, they will find their way into landfills and landfill leachate. Initiatives that reduce PFAS sources and help PFAS-intensive industries reduce use of PFAS, and thus PFAS wastes, are the most effective means of reducing PFAS in landfills and thus leachate. Crucially, though, state policy must be grounded in an understanding that PFAS cannot be completely eliminated from landfills. PFAS will persist in landfill leachate as long as significant sources of PFAS are present in the waste stream such as food packaging, construction materials, carpeting, myriad household products, manufacturing byproducts, and other goods.

Any plan for the management and reduction of PFAS must also address exposure to PFAS and management of PFAS waste. Landfills receive PFAS in various wastes, but this does not equate to public exposure. Members of the public are exposed to PFAS at much greater degrees and frequency through the foods and other products they purchase. State of the art lined and heavily regulated landfills, like those operated by WRRRA members, play a role in sequestering and limiting exposure to the public by these chemicals. The waste disposal industry is an obvious partner in developing sound recommendations for the management of PFAS long-term.

WRRRA asks that the Department consult with the industry and association on any future action regarding this topic and PFAS in the waste stream. WRRRA was not contacted and asked to participate in the stakeholder group for this plan and we are not aware of any members from the landfill sector that were contacted either. The stakeholder group includes environmental associations that work on waste industry issues, but no waste industry representation. Waste management is an integral component of any plan to reduce the impacts of PFAS on human health and the environment. We request that the Department include solid waste industry representation on stakeholder groups in the future and consult with our members before further developing recommendations that could impact their operations.

Please direct any questions or comments to Rod Whittaker at rod@wrra.org. Thank you for the opportunity to comment.

Respectfully submitted,

A handwritten signature in black ink that reads "Brad R. Lovaas". The signature is written in a cursive, slightly slanted style.

Brad R. Lovaas

Executive Director